**Consultation on how GCSE, AS and A level grades should be awarded in summer 2021**

**Overview**

Ofqual and DfE have issued two consultations following the Secretary of State’s announcement that A/AS Level and GCSE exams will not go ahead in summer 2021.

* How GCSE, AS and A Level grades should be awarded in summer 2020 (consultation link [here](https://www.gov.uk/government/consultations/consultation-on-how-gcse-as-and-a-level-grades-should-be-awarded-in-summer-2021))
* Alternative arrangements for the award of VTQs and other general qualifications in 2021 (consultation link [here](https://www.gov.uk/government/consultations/consultation-on-alternative-arrangements-for-the-award-of-vtqs-and-other-general-qualifications-in-2021)).

Both consultations end Friday 29th January and HELOA will be responding to the consultation on behalf of its members.

To help members feed into the response, please find included in this document:

1. **Key questions posed impacting HE which we are seeking member feedback on**
2. **Initial thoughts from HELOA Partnerships Team and wider UK Committee**
3. **Summaries of the consultations**

**We will be hosting two webinars on Monday 25th January between 1-2pm and 5pm-6pm for you to attend and ask questions, feed in your thoughts.**

*Zoom session details included in the consultation email. These will be available on a first come first in basis and we are capped at 100 participants. Notes from the discussion will be shared following these sessions and placed in the document library of our website.*

**Key questions we would like your feedback on:**

**How GCSE, AS and A Level grades should be awarded in summer 2020**

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| **14.Do you have any comments on the use of exam board papers?** |
| *‘[T]he government considers that exams cannot be held in a way which is, and which is perceived to be, fair’* and yet what is proposed as an alternative, sounds like more exams resulting in confusion. There needs to be more clarity urgently in order for stakeholders including students, to be able to reasonably feedback. However, examinations may be the best solution for private candidates who schools/colleges won’t be able to comment on ‘other performance evidence’ indicators of achievement, knowledge, skills.  |
| **19.Do you have any comments on the use of non-exam assessment and separately reported results and grades?** |
| Coursework and a modular approach to assessment where possible could help showcase students’ understanding of the breadth of content they have covered so far, choosing topics teachers identify. For practical demonstrations and these separately reported grades, further guidance is needed for how these will be assessed fairly if unable to do so in a school/college setting. What will the alternative be? |
| **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?**  |
| Also unclear in definition that it could include; formal tests, mock exams, **substantial candidate work (relating to qualification spec, where teachers are confident it was completed without external support).** ‘Substantial candidate work’would need defining more clearly – coursework? How will discrepancies between schools/colleges be accounted for to ensure students aren’t disadvantaged by mixed experiences in closures and impacts to mocks/formal tests in school/college?  |
| **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?**  |
| This seems sensible given the pandemic and government-imposed lockdowns. It seems unfeasible that large numbers of students will practically be able to sit tests in schools/colleges and challenges around invigilators who are likely to be in groups that may be isolating/vulnerable. Preparing for remote assessments should certainly be planned for if assessments are to go ahead, but communication around this needs to be very clear and timely. If assessments are planned to take place at home, consideration of students' working environment [space, quiet] and adequate resources [should a device or internet be required] would be paramount.   |
| **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?**  |
| Building in time for appeals seems sensible and allowing more time for considered decision making for transitions and next steps.  |
| **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?**  |
| Need more information on how this would work in practice for admissions. Also implications of moving when universities are informed of formal results on staffing over summer.  |
| **61/63.Do you believe the proposed arrangements (any or all) would have a positive/ negative impact on particular groups of students because of their protected characteristics? ( The protected characteristics under the Equality Act 2010 are: age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, and sex or sexual orientation** |
| Yes, we believe proposed arrangements will have a negative impact particularly on students with a disability. Exceptional circumstances need to be considered in allocating grades. We also believe that the consultation needs to consider and pose a question as part of the consultation on those from other WP disadvantaged groups and take into account digital poverty. |

**Alternative arrangements for the award of VTQs and other general qualifications in 2021**

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| **Q2. Do you agree that written exams for other general qualifications that are not GCSEs, AS or A levels due to take place from April onwards this academic year, should be subject to alternative arrangements similar to that taken for GCSEs, AS and A levels, as addressed in part B of this consultation?** |
| Yes, there is a need for consistency of approach across qualifications.  |
| **Question 5a: Do you agree that practical exams required for employment and apprenticeships should continue to go ahead throughout the academic year, where they can be delivered in line with public health measures, or otherwise will need to be delayed?** |
| We would suggest delaying assessments where possible, but where this is not possible, to proceed with priority professional, statutory and regulatory body requirements.  |
| **Question 25: To what extent do you agree/disagree with our proposed approach for private candidates/learners?**  |
| Examinations may be the best solution for private candidates who schools/colleges won’t be able to comment on ‘other performance evidence’ indicators of achievement, knowledge, skills.  |

**Summary of How GCSE, AS and A Level grades should be awarded in summer 2020.**

* **Proposed to use teacher assessment of evidenced standard students are performing at.**
* Seeking feedback about how to support them to make assessments fairly and consistently. **68 questions in consultation.**
* Ensure process for appeals if students do not believe grade reflects the evidence of the standard they’ve performed to.
* Private candidates should be issued a grade too.

**1 Overview of proposals**

* Students continue education and are assessed between May – June. Submit grades by mid-June.
* **Results issued to students once the QA process is complete, most likely early July.**
* **Students able to appeal these immediately, first considered by schools and colleges.**
* Exam boards provide guidance and training, making a set of papers available as part of assessment.
* Teachers draw on a range of broader evidence of students’ work.

**2 What the grades will mean**

* Acknowledge students and people using them to make decisions, need confidence their grades are meaningful.
* Exam boards will issue certificates of grades remaining accountable for results.
* Teachers will not be expected to speculate on students’ achievement should the pandemic not have happened or had they been able to take exams [2020].
* Indicate demonstrated knowledge, understanding and skills on content they have covered.
* Teachers should ensure sufficient breadth or content coverage, so as not to limit progression.

**3 When teachers should assess the standard at which students are performing**

* **Students should engage fully with their education for the remainder of the academic year to help with their progression, so final assessment should be as late in the academic year as possible.**
* Students should be given time to complete their non-exam assessments to contribute to teacher evidence submitted for their grades.
* Exam boards should provide guidance on adjustments that could be made to the way non-exam assessments are completed in current circumstances
* Proposal of timings set out above, to allow maximum learning time for students and minimise delay to progression.

**4. How teachers should determine the grades they submit to exam boards**

* Teachers should only take evidenced based decisions about the grade they recommend their students are issued, using a breadth of evidence.

**4.1 The use of exam board papers**

* Teachers should assess objectively.
* Exam boards might work jointly on guidance and training where appropriate to teachers, and sample teachers’ marking as part of external QA.
* Papers from exam boards would provide consistency within and between schools and colleges, as evidence of students’ work to inform grading and could help with appeals.
* Keep questions in similar style and format to normal exam papers. Could use a combo of past paper and new questions.
* Papers should allow students opportunity to perform to their standard [breadth of grades].
* If following consultation, papers are decided on, the exam boards would need to develop and provide information on the topics included in the papers.
* **They should cover a reasonable proportion of content, with some teacher choice of topics for their students.**
* **Teachers could choose shorter papers based on topics, accounting for if disruption has led to partial-covering of content. In which, multiple papers could be selected to ensure sufficient coverage.**
* Students will need to take papers covering a similar proportion of content to avoid disadvantaging students who have to show they can perform across a wider range of topics than those just covering a couple of topics.
* Topics covered shouldn’t be too narrow, as this would reduce opportunity for students to showcase their standard of performance.
* Approach of breadth will need to be tailored for each subject.
* **Exam boards should provide guidance on how teachers account for other evidence of student’s standard of work and other factors affecting their performance.**
* Teachers should record the evidence on which they base their decision for each student. This will be essential if students choose to appeal, and by exam boards for QA.

**4.2 Subjects with non-exam assessments and separately reported results and grades**

* Subjects with existing non-exam assessments, the final assessment standard should be considered.
* Students shouldn’t be penalised if they have been unable to complete their non-exam assessment for reasons outside their control. In which case, teachers would need to assess available evidence.
* Exam boards to provide guidance on this – including any changes to the conditions under which assessments should be taken. Weighting used by a teacher recorded to support QA and appeals.
* **Art and Design GCSE, AS, A levels, propose students’ portfolio is used as sole evidence to decide grades [complete or not].** Students shouldn’t be penalised if incomplete due to reasons outside their control.
* **While teachers should mark non-exam assessments, exam boards are not required to moderate.**
* Proposed students awarded grades for English language, MFL, A level sciences, where language skills or practical skills are assessed ordinarily, receive an accompanying grade for separately reported elements. Teachers can use any evidence of a student’s performance collected at the point of award of a grade to determine separately reported grade.

**4.3 Other performance evidence**

* Teachers should use additional ways to assess students and to gather evidence of standard of performance, regardless of exam papers use or not.
* Exam boards would provide guidance to do this for each subject on relative use of different forms of performance evidence.
* Could include; formal tests, mock exams, **substantial candidate work (relating to qual spec, where teachers are confident it was completed without external support).**
* If teachers devise their own assessment materials, they should be comparable in demand to EB papers, so students can demonstrate standards they can perform to.
* Timings of teachers' own assessments would need to be parallel with EB’s to avoid advantage/disadvantage to students. Would require mark schemes to support consistency and appeals.
* **Greater weight should be given to evidence of a student’s performance closer to time of final assessment.**

**5. The assessment period**

* Any assessment papers should take place in a set time to avoid advantage to later students or if papers are leaked. Mitigate this by:
	+ EB’s could create a menu of papers teachers could choose from, published shortly before assessment, students wouldn’t know which one(s) they’d be required to complete
	+ All students could complete subject papers within a certain time frame
* Following consultation, EB’s will seek views from schools and colleges on dates between which papers can be used.
* Propose for fairness and consistency, papers should be assessed late in the academic year.

**6. The conditions under which students should be assessed**

* **If the pandemic makes it essential, where papers used in final assessment, they could be completed at an alternative venue, including a student’s home, where that’s an option.**
* **If evidence of final assessment not completed under teacher supervision (directly or remotely) the student (and anyone supervising) would be required to declare that they haven’t received unauthorised assistance.**
* EB’s would specify the time a student should be given to complete it and access to materials they may have.
* Provisions for disabled students and reasonable adjustments would be made.

**7. Supporting teachers**

* EB’s supporting materials and training should cover; exemplars where possible, to guide teachers as they assess their students, how to conduct assessments, information on other performance evidence that could be considered, best practice to avoid bias and discrimination, all how they should consider extenuating circumstances outside their control that could impact on performance.
* EB’s should check expectations of SLT’s and their teachers and that appropriate arrangements to support staff have been put in place.
* EB’s to consult on support materials and training schools and colleges would most value.

**8. Internal quality assurance**

* Schools and colleges should receive support and info from EB’s on assessment requirements to ensure consistency.
* Schools and colleges would agree on an approach to assessment in line with exam requirements, including how other performance evidence is used.
* **Internal standardisation arrangements, and HoD and Head of Centre agree and sign off grades submitted by teachers.**
* Evidence needs to be retained to support QA and appeals.
* **Key QA component, declaration by head or principal confirming EB’s requirements had been met, and support grades submitted, all teachers had regard to guidance and support provided.**

**9. External quality assurance**

* EB’s should quality assure school and college approach and require assurance about internal QA arrangements used
* **Expect EB’s to target QA to new schools/colleges or those whose arrangements for internal QA appear less robust, scrutinise evidence to support grades that appear unusually high or low**.
* EB should sample subject level evidence on which submitted grades are based.
* EB’s should not issue results to affected students, if evidence is lacking/ appropriate QA has not been used. Head to investigate and submit necessary changes.
* **Where robust investigation indicates guidance not followed or malpractice and following discussion with school/college, EB’s reserve right to alter grades.**
* **EB’s required by Ofqual to take all reasonable steps to prevent malpractice, investigate it and take proportionate action.**
* **Grades would only change, in this process, as a result of human intervention.**
* EB’s working together with consistency and avoiding unnecessary burden on schools and colleges.
* EB’s to ensure SLT have put necessary arrangements in place to fulfil the role.

**10. How students could appeal their grade**

* **Propose teachers should not tell students the grade submitted to EB’s on their behalf.**
* However, once results are issued, a student who believes their teacher made an error, should be able to appeal to their school/college on that basis. Review would encompass both a review of the marking of papers provided by the EB or school/college, marking of non-exam assessments, and any other evidence used to arrive at the overall grade.
* Appeals considered by competent people appointed by school/college not involved with original assessment.
* Found errors should be corrected. Teacher assessment could be adjusted up or down, but only changes if the person undertaking appeal found the outcome was not legitimate – not arrived reasonably exercising academic judgement.
* Students could appeal to EB once the outcome of school/college appeal is received, on grounds that the school/college had not acted in line with EB’s procedural requirements. If the correct procedure followed, they couldn’t appeal to EB.
* EB’s to decide on fees for appeals made to them.
* **Seeking views to bring results day(s) forward to relieve pressure on the appeals process.**
* **If an appetite for this, will consider interaction between timings students receive them and results becoming formal for university admissions, to ensure no delay to existing admissions timelines.**

**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?**

**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?**

**11. Private candidates**

* To award them grades, 4 approaches:
1. for private candidates to complete the papers set by the exam boards for use in schools and colleges. The exam boards would mark the papers (and any completed non-exam assessment) and issue a grade to the private candidate based on their performance.
2. for private candidates to work with a school or college willing to assess the standard at which they are performing – using the same type of evidence the school and college is considering for its students.
3. for the exam boards to run normal exams for private candidates to take in the summer of 2021 – appropriate venues would need to be provided.
4. **for the exam boards to run normal exams for private candidates to take in the autumn of 2021 – appropriate venues would need to be provided.**
* Wish to be confident of routes available for private candidates to receive a grade, managing the costs to them.
* recognise pressures on schools and colleges which might make them reluctant to make entries for and assess private candidates.
* will also need to be able to appeal aligned with how their grade was determined.

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

* **Dual systems where some students in other countries took these quals, but students’ grades in England were determined by teacher assessment, could give rise to concern over 2 types awarded. One on exams performance and one on teacher assessment.**
* **Exams best way to assess performance, may be appropriate to allow students who will not otherwise be able to be issued with a grade, and private candidates in England.**

**13 How the proposed arrangements for 2021 differ from those used in a normal year and those used in 2020.**

* Click [here](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/953000/6743-1_GCSE__AS_and_A_level_grades_should_be_awarded_in_summer_2021.pdf) for doc showing table.
* **EB’s will not be able to set grade boundaries as no exams are taking place, schools will not be required to put students into rank order or speculate what students would have achieved in exams.**
* Usual assurance of comparability between years, individual students and schools and colleges and EB’s will not be possible.
* **Changes to teachers’ grades should be the exception and will only be if the grade could not legitimately have been given based on the evidence.**

**Equality impact assessment**

* Awarding org’s are required to comply with equalities legislation and monitor quals to identify features which may disadvantage a group of learners who share protected characteristics.
* **Reasonable adjustments** such as extra time, assessment into large font could be made in alternative venues to a school/college for disabled students. **Others are harder to make.**
* **Eg, scribe, specialist equipment or software for remote assessments.**
* Approach of awarding grades should be accessible to those in hospital education or alternative provision.
* **Aware proportion of private candidates are SEND or have an illness.**
* **Will highlight to EB’s their duty to make assessments accessible extending to revised arrangements.**
* Seek to ensure alignment between GQs and VTQs.
* Need to make sure all students, regardless of background or circumstance, have direct access to information about arrangements and appeals.

**Regulatory Impact Assessment**

**Impact on schools and colleges**

* One-off, direct costs and admin burdens to schools and colleges for:
	+ familiarisation with information and guidance from exam boards on teacher assessment and submitted grades
	+ communication and training from senior leaders to teaching staff on teacher assessment and submitted grades
	+ marking and quality assurance of teacher assessments and submitted grades
	+ amendments to centre systems to enable the required information to be gathered and submitted to exam boards in a format specified by them
	+ managing high volumes of enquiries from candidates and parents
	+ managing potentially high volumes of appeals
* delivering alternative arrangements in place of, not in addition to, the usual range of activity required to deliver summer exams.
* Acknowledge burden of revised arrangements could be greater and more challenging for EB’s and centres, where staff availability is affected by COVID-19 and centres are closed for normal teaching and impact of COVID on workload of teachers and colleagues.

**Impact on students**

* One-off, direct costs and admin burdens to AQA, OCR, Pearson and WJEC Eduqas [providing the regulated GCSE, AS and A level quals] for:
	+ familiarisation with guidance published by Ofqual on the approach to submitting grades
	+ familiarisation with any new or revised general and qualification level conditions
	+ information and training to centres to inform teacher assessments, quality assurance and submission of grades to exam boards
	+ guidance on reasonable adjustments and special consideration in the context of teacher assessments
	+ if and where required, development of papers in each subject and provision of training and mark schemes to support teacher marking
	+ development and delivery of processes and systems for the collation of grades submitted by centres
	+ preventing, detecting and investigating any malpractice or maladministration relating to the provision of submitted grades
	+ external quality assurance of submitted grades
	+ issuing of results in accordance with new arrangements
	+ managing increased volumes of enquiries from centres and candidates
	+ familiarisation with, and delivery of, the revised appeal arrangements agreed post consultation
	+ assessment of changed costs – both decreasing and increasing – and determining appropriate fees
* If private candidates sit assessments and are marked directly by EB’s, the EB’s will incur marking costs.
* If they sit exams, EB’s will incur development and delivery costs, in addition to marking costs.

**Impact on the FE and HE sectors and employers.**

There would be significant negative impacts on the FE and HE sectors and employers if students were not able to progress as planned in 2021. **However, our proposed arrangements aim to ensure that students receive grades in time to be able to progress to FE or HE, with the possibility of earlier results dates so that appeals can begin to be dealt with before FE and HE decisions are made.**

**Summary of Alternative arrangements for the award of VTQs and other general qualifications in 2021.**

**Part A: DfE- policy & scope**

* Alternative arrangements to written exams (similar to those proposed for GCSEs and A levels) are needed for those VTQs and other general qualifications most like GCSEs and A levels.
* Some form of teacher assessment is likely to be most appropriate.
* Where practical assessment to demonstrate occupational competency or to gain a licence to practice these assessments should continue when possible, subject to health guidance.
* On-demand, such as Functional Skills, assessments - including remote assessments - can go ahead if in line with PHE. Where learners are unable to access FSQ assessments, an alternative method of awarding these qualifications is needed to ensure learners can progress.

**Part B: Ofqual - regulation & implementation**

Proposed that Awarding Organisations will

* determine most appropriate approach to awarding based on their qual design and delivery
* determine what the minimum assessment evidence should be, so that valid and reasonable quals are awarded; including consideration of completed assessments
* be supported to develop consistent approaches across different awarding orgs, and quals, as far as possible
* make awards when exams don’t take place and/or not all internal assessments have been completed
* provide clear and timely guidance to teachers, on how grades will be awarded and what they need to do, mindful of the burden placed on teachers

**FE, HE and employers**

We recognise that there would be significant negative impacts on FE and HE and employers – in terms of their recruitment activity – if large numbers of learners were not able to progress as planned because they were unable to pass or complete their qualifications because of disruptions to teaching, learning and assessments arising from the pandemic.

We consider that the approach we are proposing will help to mitigate this risk without undermining the validity of qualifications. However, we also recognise in our objectives that there is a need for a system-wide approach to address the risks impacting on qualifications and assessments which are outside the scope of our regulation, and we will work with partners, stakeholders, other regulators and the Department to achieve this.