

Consultation on marking reviews, appeals, grade boundaries and Code of Practice for GCSEs, AS and A levels

Response of the Association of School and College Leaders

- 1 The Association of School and College Leaders (ASCL) represents more than 18,500 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
- 2 ASCL members believe that we need to have an awarding body regulator which has the confidence of the profession. We believe an awarding body regulator has a key role to play in ensuring that the marking, reviews and appeals process is as transparent, effective and thorough as it can be. Fairness to candidates must be the overriding principle.
- 3 Whilst we welcome Ofqual's intention to investigate grading issues as part of its programme of standards reviews and to engage publicly with debate on exam standards, we remain concerned that this consultation does not fully address the key issue of fair and accurate marking for students. The priority for ASCL members is to improve the quality of the assessment system so that students receive an accurate assessment of their work against a published set of criteria.
- 4 ASCL members are once again concerned about the volatility in exam marking in 2015. We urge Ofqual to work closely with awarding bodies to regulate the marking of examinations more closely than ever given the increase in workload caused by reformed qualifications.
- 5 ASCL members welcome proposals which ensure that the setting of grade boundaries is consistent and fair; a priority for our members is to ensure that there is a sufficient range of marks within each grade.
- 6 ASCL is broadly supportive of Ofqual's proposal to allow centres to see marked GCSE assessments before deciding whether to request a review of marking or administrative error, as this enables schools to make such a decision from an informed position. However, we are concerned about potential cost of this service to schools and whether the timing constraints will increase schools' workload.
- 7 We understand that there were significant administrative errors in 2015 and we are concerned that an increase in assessment through examination will lead to a further increase in such errors. We would not want a centre's involvement in viewing scripts to be viewed as an additional checking exercise for awarding organisations.

- 8 We are fully supportive of all awarding organisations ensuring robust arrangements are in place to correct administrative errors that are identified.
- 9 ASCL is concerned about proposed changes to the processes of internal marking by centres of coursework. The key moderation process in centres is likely to be constrained if centres have to ensure there is a spare member of staff who can conduct the independent review when a parent or student appeals against the pre-moderation mark. We are also concerned that this may result in parents deciding to appeal against a mark from an uninformed position. A further concern is the time that would need to be built into the process to accommodate this additional process as work will need to be submitted even earlier, which is likely to render courses such as AS Art unteachable within one year. In our view centres should be able to make decisions over when and how to distribute unmoderated assessment results to students, taking into account their particular knowledge of individual students.
- 10 ASCL understands the reasoning and equality issues behind Ofqual's proposal to stop exam boards replacing one reasonable mark with an alternative reasonable mark. However it is important that candidates and centres can challenge marks where they feel there has been a gross error of professional judgement and the concept of allowing 'reasonableness' risks becoming synonymous with 'tolerance'. We are concerned that this interpretation of 'reasonableness' could disadvantage students and can foresee potential problems if we move from the current position where reviewers can change the mark if they deem it necessary.
- 11 Persistent under or over marking might not be regarded as unreasonable on every question but cumulatively this would make a significant and unreasonable difference in outcome. Clarification is required about the triggers for a cohort remark under this proposed system if errors are found under this service.
- 12 It is understandable but disappointing that the fairest and most reliable method of ensuring that students receive an accurate grade for their work (double blind marking) is too expensive to implement; however the focus must still be on making the review process as robust as possible.
- 13 ASCL welcomes the recommendation for exam boards to give centres or candidates reasons for the outcomes of their reviews of marking and moderation. There has been a steady increase in the last few years in regards to enquiries about results and reviews of marking which is indicative, in part, of a level of dissatisfaction with the quality of marking. Transparency about the reasons behind a decision following a review of marking would be welcome in the current climate.
- 14 ASCL welcomes the proposal that reviewers of marking and moderation be specifically trained for this role and believes this is long overdue and this is a distinctive skill and different from marking. We also support the recommendation not to allow reviewers to review their own marking or moderation decisions. This would ensure more consistency and enable more detailed monitoring of examination markers to take place. We also welcome the transparency about how exam boards train and prepare their markers to undertake review of marking/moderation.
- 15 ASCL supports the proposal to open up grounds for appeals rather than just on the basis of an exam board not following its own procedures. We believe that appeals should be allowed on the grounds that the mark could not reasonably have been awarded on the basis of consideration of the candidate's work against the mark scheme and that the moderation decision could not reasonably have been made by a moderator who had considered the candidate's work, the teacher's mark and the mark

scheme and any relevant procedures. Centres should be able to say, in reference to the mark scheme, this is right or not right. We also believe centres should have the opportunity to appeal against an exam board's response for a special consideration or a reasonable adjustment.

- 16 ASCL believes that all candidates should receive the right mark for their work and therefore we support the decision, that if administrative errors are found, they should, be applied across the cohort. However we urge the exam board to ensure that all checking exercises are undertaken before and during the marking. Clarification is required on how exam boards will deal with the issue of a cohort wide incorrect result.
- 17 ASCL does not support the proposal to remove the Code of practice; we would recommend that this should be reviewed and updated but not totally removed. It is imperative that awarding organisations communicate with centres effectively in a clear and transparent way with a well understood common framework, and set and publish consistent reasonable deadlines. This is crucial as centres will be implementing an unprecedented amount of qualification reform. This is not the time to introduce further radical changes which will contribute to schools' work load.
- 18 ASCL members are concerned that removal of the Code of Practice and set of rules for awarding organisations could lead to market-driven competition around quality and is likely to cause confusion and a lack of clarity in centres and may lead to an erosion of standards.
- 19 We support the review that exam boards should take all reasonable steps to meet target timescales. However given the intransigence on the part of exam boards when a school does not meet a deadline, it is reasonable to expect that there should be compensatory action for a centre when an exam board does not meet its deadline for a review or marking service .There were too many cases of students losing university and college places in 2015 due to late returns of reviews of marking which did not meet their own deadline.
- 20 ASCL supports the recommendation to require exam boards to publish additional information about the outcomes of reviews and appeals and about administrative errors.
- 21 ASCL agrees with the proposal that by exam boards should consider a wide range of specified evidence when setting specified levels of attainment for new and legacy GCSEs, AS and A levels
- 22 ASCL is concerned about the timescales for implementation of some of these proposals for the 2016 exams. There is insufficient time to ensure adequate communication and understanding around key issues.
- 23 I hope that this is of value to your consultation, ASCL is willing to be further consulted and to assist in any way that it can.

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Association of School and College Leaders
11 March 2016