

Department for Education and Ofqual consultation on the proposed changes to the assessment of GCSEs, AS and A levels in 2022

Response from the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 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 welcomes the opportunity to contribute to this consultation.

B. General points

3. ASCL welcomes these proposals, and the fact that the Department for Education and Ofqual have accepted that adaptations need to be made to both general and vocational and technical qualifications this year, to recognise the ongoing impact of the pandemic. It is helpful that this consultation has come out earlier than last year, but disappointing that these decisions have again not been made in time for schools and colleges to plan their approach to teaching, learning and assessment for September. The decision to delay confirming adaptations to the summer 2021 exam series (had it gone ahead) until the autumn term placed considerable stress, anxiety and workload on school and college leaders, teachers, students and parents. All these key stakeholders need to know the proposed adaptations before the start of the academic year.
4. With this in mind, we are also disappointed that this consultation does not seek views on specific contingency plans in the event that public exams are deemed untenable in 2022. Throughout autumn 2020, the sector was told repeatedly by ministers and government officials that exams would go ahead in summer 2021, and that contingency plans therefore weren't required, only for that to change on 4 January 2021. As late as 8 December 2020, the Chief Regulator advised Parliament that schools and colleges did not need to collate any formal evidence of students' performance. This remark, and the subsequent government u-turn three weeks later, resulted in considerable and unnecessary workload and anxiety for leaders, teachers, students and parents.
5. It is important to learn lessons from the past year. We know that, alongside this consultation, Ofqual is running a survey into the strengths and weakness of the process of awarding teacher-assessed grades this year. However, the failure to properly consult on contingency arrangements for 2022 exams means that, as last year, schools, colleges and learners will be returning this autumn unclear about the government's

plans for how they will be assessed in crucial public exams. Our Association finds that unacceptable, and is deeply disappointed that our members and their communities have been put in this position again.

6. With regards to the specific proposals suggested, ASCL broadly welcomes them. The decision to extend or introduce optionality in English literature, history, ancient history and geography GCSE is sensible. In autumn 2020 ASCL, along with other organisations, advocated introducing greater optionality for all subjects. It is regrettable that the lateness of this consultation apparently means that this is too difficult to achieve in the time remaining.
7. We note that the optionality proposed for geography is significantly more restricted than the optionality afforded to English literature and history, with only a choice between two sections in one of the papers. As this change is being made over halfway through the course for most schools and colleges, this will place some centres at an unfair disadvantage depending on their curriculum sequencing. We would prefer an approach to optionality in geography which is more in line with that offered in history and English literature.
8. We broadly welcome the suggestion of advanced notice in most qualifications. This allows Ofqual to set a regulatory framework, and the Department a policy direction, which is responsive to the public health situation in the autumn. Advanced notice allows for awarding organisations to provide this information sooner or later, and for the detail of the information given to be responsive. This is helpful.
9. We believe that advanced notice should be consistent within the same qualification across different exam boards to ensure fairness, but the nature and format of the information given may vary between subjects. This will respect the disciplinary rigour of different subjects' assessments.
10. We agree that national adaptations are the correct approach. Although regions have been affected differently by the pandemic, the effect of those differences on individual centres and candidates is too complex to be reflected in a national grading process.
11. If exams are able to go ahead next summer, the timetable for these must be given careful consideration to ensure that exams for the same qualification are spaced out as much as possible. ASCL strongly advocates a return to the normal exam window, and the normal results days.
12. Overall, we broadly welcome these proposals to address the differential impact of lost learning. However, this consultation is taking place much too late and, as outlined above, should have included a robust contingency plan that could be communicated to schools and colleges before the start of the academic year. The outcomes of the consultation must, therefore, be communicated as early as possible in order to alleviate some of the stress associated with the assessment changes for staff in 2020-21.
13. We have responded separately to the parallel consultation on VTQs, based on the same principles.

C. In response to your specific questions

To what extent do you agree or disagree that centres should have some choice of topics on which their students will answer questions for GCSE English literature exams in 2022?

14. We agree with this proposal.

Do you have any comments on our proposed approach to carrying forward specific assessment arrangements for GCSE English literature in 2021 into 2022?

15. The same degree of optionality must be offered by all awarding organisations, which was not the case in the aborted plans for 2020.

To what extent do you agree or disagree that centres should have some choice of topics on which their students will answer questions for GCSE history exams in 2022?

16. We agree with this proposal.

Do you have any comments on our proposed approach to carrying forward specific assessment arrangements for GCSE history for 2021 into 2022?

17. No.

To what extent do you agree or disagree that centres should have some choice of topics on which their students will answer questions for GCSE ancient history exams in 2022?

18. We agree with this proposal.

Do you have any comments on our proposed approach to carrying forward specific assessment arrangements for GCSE ancient history for 2021 into 2022?

19. No.

To what extent do you agree or disagree that we should allow centres to have some choice of content on which their students will answer questions in GCSE geography, on the lines set out at Annex B?

20. We neither agree nor disagree with this proposal (see explanation below).

Do you have any comments on our proposed approach to allowing centres to have some choice of content on which their students will answer questions in GCSE geography exams in 2022?

21. While greater optionality in all qualifications is welcome, we have particular concerns about the proposals suggested for geography GCSE. It is right to introduce optionality for GCSE geography alongside the adaptations to GCSE history, as most candidates take either one or the other qualification. This should result in greater fairness.

22. However, the proposals outlined in Annex B are more prescriptive than the optionality afforded to both GCSE history and GCSE English literature. Introducing these over halfway through the course may seriously disadvantage some centres and their candidates who have already prioritised the teaching of the now optional elements. This

would undermine the fairness of the qualification, and therefore the public's confidence in the examinations.

23. Moreover, the decision (already consulted on, and confirmed) to assess candidates on fieldwork questions for fieldwork that they may not have undertaken may disadvantage some candidates.

24. ASCL welcomes optionality in GCSE geography but urges Ofqual and the Department to consider a different approach, in which centres have more flexibility over which of the topics they choose.

To what extent do you agree or disagree that we should carry forward into academic year 2021 to 2022 the arrangements in place for 2021 to 2022, that allow centres to deliver practical work in GCSE biology, chemistry, physics, combined science, geology and astronomy, AS level biology, chemistry, physics and geology, and AS and A level environmental science by demonstration?

25. We agree with this proposal.

Do you have any comments on our proposed approach to carrying forward specific assessment arrangements for 2021 into 2022 for GCSE biology, chemistry, physics and combined science, geology and astronomy, AS biology, chemistry, physics and geology, and AS and A level environmental science?

26. No.

To what extent do you agree or disagree that we should carry forward from academic year 2020 to 2021 into academic year 2021 to 2022 the arrangements that allow centres to assess the CPAC across the minimum number of practical activities required to enable students to demonstrate their competence in A level biology, chemistry, physics and geology?

27. We agree with this proposal.

To what extent do you agree or disagree that we should carry forward from academic year 2020 to 2021 into academic year 2021 to 2022 the arrangements to allow the remote monitoring of centres' application of CPAC?

28. We agree with this proposal.

Do you have any comments on our proposed approach to carrying forward specific assessment arrangements from academic year 2020 to 2021 into academic year 2021 to 2022 for A level biology, chemistry, physics and geology?

29. No.

To what extent do you agree or disagree that we should carry forward from academic year 2020 to 2021 into academic year 2021 to 2022 the arrangements to remove (where applicable) the exam board set task in GCSE, AS and A level art and design?

30. We agree with this proposal.

Do you have any comments on our proposed approach to carrying forward from academic year 2020 to 2021 into academic year 2021 to 2022 the specific assessment arrangements for GCSE, AS and A level art and design?

31. No.

To what extent do you agree or disagree that exam boards should provide advance information about the focus of the content of exams for the majority of GCSE, AS and A level subjects?

32. We strongly agree with this proposal.

To what extent do you agree or disagree that we should be flexible in the timing of the release of advance information in order to respond to the impact on education of any potential worsening of the pandemic?

33. We strongly agree with this proposal.

Do you have any comments on the proposed flexible approach to the timing of the release of advance information in 2022?

34. ASCL broadly welcomes the proposal to release advance information in the spring term, but with flexibility allowing for an earlier release if we see continued disruption to in-school learning in the autumn.

35. There are good arguments for releasing advanced information at the start of the academic year, in order to focus teaching and learning. However, on balance, we feel that the risk of this leading to a narrowing of the curriculum content studied outweighs the benefits.

36. It is important, though, that there is clarity about what scenarios would lead to advanced information being released earlier than planned.

To what extent do you agree or disagree that for GCSE English literature, where we propose that centres should have some choice of topics on which their students will answer questions, the exam boards should not provide advance information about the focus of the content of exams in addition?

37. We agree with this proposal.

Do you have any comments on our proposal not to provide advance information for 2022 for GCSE English literature?

38. No.

To what extent do you agree or disagree that for GCSE history, where we propose that centres should have some choice of topics on which their students will answer questions, the exam boards should not provide advance information about the focus of the content of exams in addition?

39. We agree with this proposal.

Do you have any comments on our proposal not to provide advance information for 2022 for GCSE history?

40. No.

To what extent do you agree or disagree that for GCSE ancient history, where we propose that centres should have some choice of topics on which their students will

answer questions, the exam boards should not provide advance information about the focus of the content of exams in addition?

41. We agree with this proposal.

Do you have any comments on our proposal not to provide advance information for 2022 for GCSE ancient history?

42. No.

To what extent do you agree or disagree that for GCSE geography, where we propose that centres should have some choice of content on which their students will answer questions, the exam boards should not provide advance information about the focus of the content of exams in addition?

43. We neither agree nor disagree with this proposal (see explanation below).

Do you have any comments on our proposal not to provide advance information for 2022 for GCSE geography?

44. If the adaptations made to GCSE geography are as outlined in Annex B, then we would advocate that advanced notice should be given to increase fairness, as the level of optionality is so much more restricted than for English literature, history and ancient history. However, as set out earlier, we would prefer the approach to optionality in geography to more closely match that proposed in history and English literature. This would, in our view, alleviate the need to provide advanced notice in geography.

Are there any GCSE, AS or A level subjects for which advance information about the focus of the content of exams should NOT be given to students in advance of the exam?

45. No.

If you have identified any subjects above, do you have any comments on the subjects that should NOT be given advance information about the focus of exams in 2022?

46. No.

To what extent do you agree or disagree that a formulae sheet should be provided in the exam room for GCSE mathematics in 2022?

47. We strongly agree with this proposal.

Do you have any comments on the proposal to provide a formulae sheet in the exam room for GCSE mathematics in 2022?

48. No.

To what extent do you agree or disagree that a revised equation sheet covering all relevant equations should be provided in the exam room for GCSE physics and combined science in 2022?

49. Strongly agree.

Do you have any comments on the proposal to provide a revised equation sheet covering all relevant equations in the exam room for GCSE physics and combined science in 2022?

50. No.

Are there other potential equality impacts that we have not explored? If yes, what are they?

51. No.

Do you have any suggestions for how any potential negative impacts on particular groups of students could be mitigated?

52. The Department and Ofqual should consult on how mitigations could be introduced at the marking and grading stages of qualification, as well as the design of the assessments.

Are there additional activities associated with changing the exam and assessment arrangements for students taking GCSE, AS and A level qualifications in summer 2022 that we have not identified above? If yes, what are they?

53. Yes. The timing of the consultation means that schools and colleges were unable to plan for these changes before the start of the academic year. This may mean changing schemes of work or curriculum maps, which will create additional workload for curriculum leaders and teachers.

What, if any, additional costs do you expect you would incur if the proposed changes to the exam and assessment arrangements were introduced for summer 2022?

54. Yes. The additional workload of responding to the changes may incur hidden costs, including leaders having less capacity to fulfil other responsibilities.

Do you have any suggestions for alternative approaches that could reduce burden and costs?

55. Schools and colleges must be fully funded for any costs incurred by changes to the exam system.

D. Conclusion

56. The general approach of bringing forward the planned adaptations to exams from 2021 to the summer 2022 is sensible, as is a broadly common approach to adaptations across general qualifications. However, the decision not to consult on these plans earlier, coupled with a lack of consultation on contingency arrangements, is disappointing.

57. While education recovery is not the same for every student, and one size does not fit all, consistency of approach is important. We share the Department and Ofqual's hope that exams will be able to go ahead next summer. As the public health situation develops, the Department and Ofqual will need to be responsive to further disruption to learning in the autumn term, which again highlights the need to announce contingency plans as soon as possible.

58. We hope that this response is of value to the consultation process. ASCL is willing to be further consulted and to assist in any way that it can.

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