

Ofqual technical consultation on the General Qualifications Awarding Framework 2021

Response from the Association of School and College Leaders

March 2021

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,000 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 and further education and skills phases. 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. Responses to the consultation questions

Q1. Do you have any comments on proposed Condition GQAA1?

3. The definitions of 'Private Candidate' and 'Relevant Centre' indicate that candidates who were previously at a school or college but are no longer enrolled would not be considered 'private candidates' under the terms of the proposed framework, as they would have been previously.
4. ASCL has consistently said that while provision must be made for all private candidates to receive a grade this summer, no centre should be obligated to enter private candidates, including former students, if they do have the capacity or resource to undertake further assessment of that learner.
5. We would want reassurance that the definitions of 'Private Candidate' and 'Relevant Centre' do not undermine this.

Q2. Do you have any comments on proposed Condition GQAA2

6. We welcome both the restriction on administering exams anywhere in the UK and the decision to suspend moderation of NEA.
7. There are mixed views on the appropriateness of an autumn exam series, and so we welcome the decision to consult on this issue separately.

Q3a. Do you have any comments on proposed Condition GQAA3: eligibility?

8. Only candidates who were intending to take exams this summer should be eligible for a grade. Where centres have unusual entry patterns, this should be risk assessed as part of external quality assurance and treated as malpractice if there is not sufficient evidence that learners were intending to take exams this summer.

Q3b. Do you have any comments on proposed Condition GQAA3: determining results?

9. ASCL strongly rejects the language of 'Teacher Assessed Grade' which we think is unhelpful and misleading. While grades may be based on a teacher's assessment initially, this is against a national standard, must be moderated by at least two subject experts in the centre, undergo internal quality assurance, be signed off the head of centre, and undergo external quality assurance.
10. The language of 'Teacher Assessed Grades', instead of 'Centre Assessed Grades' or 'School and College Assessed Grades' misleads students and the public about the process this year, and may result in greater pressure on teachers during the process.

Q3c. Do you have any comments on proposed Condition GQAA3: guidance for centres?

11. Ofqual must require awarding organisations to publish all guidance relating to the grading process (including definitions of the national standard through grade descriptors and exemplification) by the end of March 2021, so that centres can plan to use these from the start of the summer term. Any delay to this would seriously compromise the ability of schools and colleges to effectively and accurately assess their students.

Q3d. Do you have any comments on proposed Condition GQAA3: quality assurance?

12. We welcome the requirement that awarding organisations will check the internal quality assurance arrangements of every centre, as we believe this will provide greater confidence in the process, and protect heads of centre.
13. The external quality assurance checks are helpful, including the set criteria which may prompt more detailed checks.
14. Random sampling, as well as selecting from types of centre, should also take into account centre size, so that some very small and very large centres are quality assured externally.

Q3e. Do you have any comments on proposed Condition GQAA3: confidentiality?

15. As centres will be required to discuss the evidence they are using to determine the grades they submit, including marked and graded pieces of work, it is possible that candidates may inadvertently work out the submitted grade. Where there was no deliberate attempt to disclose a submitted grade, this should not be treated as exam malpractice or maladministration.
16. Careful consideration needs to be given to the balance between being transparent with candidates about which evidence will be used, and the need to keep submitted grades confidential.

17. ASCL agrees that submitted grades, which may in some instances be changed by the awarding organisation during quality assurance, should be kept confidential until results day.

Q4a. Do you have any comments on proposed Condition GQAA4: the centre review?

18. This is a sensible first step of the appeals process.

4b. Do you have any comments on proposed Condition GQAA4: appeal to the awarding organisation?

19. ASCL welcomes the decision for the appeals process to be led by awarding organisations, rather than by centres themselves. We think this will give greater reassurance to candidates appealing.

20. We are unsure of the implications of the proposals in GQAA4.1.b, and feel there is potential conflict with GQAA4.6.b.b. In clause 1 it suggests that centres would only need to refer an appeal to the awarding organisation if their internal review meets one of the two criteria. This would suggest that, following a review, a centre would not be obliged to take forward an appeal. However in clause 6 the framework says that centres should request an appeal for any learner that wishes to do so. We are concerned that this could lead to ambiguity and confusion; and that the framework should make clear whether centres are obligated to take forward an appeal, even if they believe that processes have been followed and reasonable academic judgement made.

21. We are concerned about workload for senior school and college staff, teachers and administrative staff during the appeals process, which is likely to start earlier than usual this summer. Clear time periods will help provide clarity on the resource that centres will need to plan for.

22. It is ASCL's view that appeals should not be paid for by individual centres or candidates, but collectively from exam fees. We recognise that this will have an impact on the amount of rebate centres receive from awarding organisations in the autumn.

Q4c. Do you have any comments on proposed Condition GQAA4: grade protection?

23. After publication, unless a candidate consents to an appeal, their grade should not be changed, unless they are found to have committed exam malpractice themselves.

Q4d. Do you have any comments on proposed Condition GQAA4: guidance?

24. The guidance document must clarify whether candidates can obligate a centre to take forward an appeal to the awarding organisation, even when the centre does not support this.

25. It should clearly highlight that a candidate's grade may go up or down as a result of an appeal.

Q5a. Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to Teacher Assessed Grades?

26. We strongly oppose the language of Teacher Assessed Grades, as outlined in our response to question 3b above. We would urge Ofqual, the Department for Education

and the awarding organisations to immediately adopt an alternative term that takes account of the full process of awarding grades this summer.

27. In the introduction to GQAA3.2ai, you make clear that it is the awarding organisation that determines results this summer, not centres. The use of the term 'Teacher Assessed Grades' is therefore misleading.

28. We welcome the decision for the assessment of students to be based only on content they have been taught, given the variable disruption to students' learning this year.

Q5b. Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to Additional Assessment Materials?

29. ASCL welcomes the publication of additional assessment materials, and the decision to make these optional.

30. Ofqual should require all additional assessment materials for all general qualifications to be published to centres no later than Wednesday 31 March.

Q5c. Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to Internal Quality Assurance?

31. The proposed measures are reasonable and effective.

Q5d. Do you have any comments on the proposed Condition GQAA3.2(a)(i) requirements in relation to External Quality Assurance?

32. It is our understanding that some external quality assurances, including random and risk-based sampling, would need to take place after results are submitted, not before, as suggested in this proposal.

33. It is ASCL's view that the set criteria in (b)(ii) should not be defined numerically by Ofqual or the awarding organisations. This may result in unintended behaviours. Instead, awarding organisations should use an intelligent approach to risk assessment; for example, concentrating on centres that have the most unusual data first.

34. We recognise that smaller centres have statistically greater variance in results, so some small centres must also be selected for random sampling.

Q6a. Do you have any comments on our proposed Centre Guidance in relation to the Standard in 2021?

35. We welcome the fact that students will be assessed against a national standard of performance. In normal years, the standard is set through a range of qualitative and statistical processes. Because no statistical processes will be used this year, it is important that the standard for each grade in each qualification is clearly defined.

36. For this reason, we would suggest the materials provided by the exam boards don't merely 'exemplify' the standard (p4), but 'define' it. We think this could be more clearly expressed in this document.

37. The decision not to specify minimum content is understandable, and one we agree with. However, there should be guidance given on the suggested coverage of assessment objectives, to ensure that grades this year are meaningful.

Q6b. Do you have any comments on our proposed Centre Guidance in relation to Sources of Evidence?

38. We welcome the fact that Ofqual is taking a flexible approach to the evidence that can be used to reach a holistic judgement.
39. We welcome the emphasis on continued teaching and learning for as long as possible during the summer term. In practice, it is likely that most teachers will need to finish assessments before the May bank holiday to allow time for marking, moderation and internal quality assurance and sign-off.
40. We think more guidance may be needed in this document, or in the materials provided by awarding organisations, on how teachers and leaders should professionally judge the reliability and validity of different forms of evidence.
41. We think it is right that records of a student's past performance can be used as form of evidence, though in general centres should only use this when more recent evidence isn't able to be obtained. This is because assessments undertaken before the decision to cancel exams on 4 January 2021 may have served different purposes, as candidates did not know the assessment might be used as evidence towards their submitted grade. Furthermore, the Chief Regulator explicitly told Parliament that schools and colleges did not need to collect evidence to inform a centre assessed grade in December 2020.
42. ASCL has raised concerns about the requirement to tell students what evidence will be used. While we appreciate the need for transparency in the system, we worry that this could lead to a negotiation over the evidence used, as has been reported in the media. We also worry that this could result in a 'shadow grade', which may differ from the student's final, validated grade. We suggest that Ofqual or the exam boards offer help to scaffold what this conversation should include, to ensure fairness between candidates.

Q6c. Do you have any comments on our proposed Centre Guidance in relation to Private Candidates?

43. As much as possible, centres should be encouraged to use the same assessment evidence for private candidates as for their current students.

Q6d. Do you have any comments on our proposed Centre Guidance in relation to Internal Sign-Off?

44. Exam boards should provide exemplar or required forms that centres can use to document the various stages of internal sign-off. This should be consistent across boards to avoid confusion.
45. The Head of Centre Declaration is appropriate.
46. ASCL members are concerned about how evidence and records should be collated and kept, given the short time frames involved. More advice is needed on this.

Q7a. Do you have any comments on our proposed 'Making objective judgement' document relating to objectivity in grading judgements?

47. Members of ASCL Council, including our Ethics, Inclusion and Equalities Committee, have raised concerns about objectivity in the process, and so this document is very welcome.

48. Centres should also be warned against allowing knowledge of students' conditional offers for university, college or apprenticeship places to undermine the objectivity of grading.

Q7b. Do you have any comments on our proposed 'Making objective judgement' document relating to unconscious effects on objectivity?

49. This is a useful list. Ofqual should require exam boards to produce compulsory training materials on this, to which centres must have due regard during internal quality assurance and sign off.

Q7c. Do you have any comments on our proposed 'Making objective judgement' document relating to using previous data?

50. Centres should use previous cohort data to provide a high-level overview. Where certain sub-groups of students are very small, the usefulness of the data will be limited.

Q7d. Do you have any comments on our proposed 'Making objective judgement' document relating to reviewing judgements?

51. This step of the process should be explicit in the Centre Guidance document.

52. This level of review is likely to be time-consuming, especially for large centres, which may in turn reduce the amount of time available for teaching and assessment in the summer term.

Q8. Do you consider there are any equalities impacts arising from our technical proposals which we have not previously identified?

53. The technical arrangements have adequately addressed potential equalities impacts.

9. Do you consider there are any regulatory impacts arising from our technical proposals which we have not previously identified?

54. As outlined in our response to question 4b, we are unclear on the regulatory impact of obliging centres to bring forward an appeal on behalf of the candidate to the awarding organisation, even when they don't support the appeal. As Ofqual does not have regulatory power over centres, this may require new regulations from the Department for Education.

C. Conclusion

55. We are grateful for the opportunity to respond to this consultation, and hope our response is of value to the process.

56. It is in the interest of young people to make this process as successful as possible. ASCL is happy to be consulted further and to assist in any way helpful.

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