

DfE and Ofqual consultation on ensuring the resilience of the qualifications system in 2023

Response of the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 22,000 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 children and young people across primary, secondary, post-16 and specialist education. 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. Key points

3. We are glad that Ofqual and DfE are consulting on contingency plans for 2023, as well as considering longer-term solutions to make the exam system more resilient in the future.
4. The views of ASCL members are divided on this consultation. While some welcome the proposals as a change to the system they would like to see in perpetuity, others feel that they are overly burdensome on both teachers and students.
5. ASCL Council, our formal policy-making body, is broadly in favour of the proposals, and believes that they are sensible and proportionate.
6. Most schools and colleges will undertake some form of mock assessment in exam years. Having an expectation that this is done under certain conditions, and the work produced retained, seems proportionate.
7. We are pleased to note that centres are not required to undertake as many formal assessments as was recommended in 2021-2022. This did place additional burdens on teachers and students, and led to confusion about how much evidence was required.
8. We also note that it is a difficult balance to achieve consistency between centres, in case exams are cancelled for any reason, and flexibility so that centres can continue with their existing assessment practices. It is ASCL Council's view that the balance proposed is appropriate.
9. Following this consultation, any guidance should make clear that centres are still, of course, allowed to conduct other mock assessments, in class or under exam conditions, that might be used in other ways, including for formative purposes. We know this is an important part of many schools' exam preparation with students.

10. ASCL Council also considered the fact that a small number of candidates in 2022 were unable to sit any papers for a qualification for which they had fully studied (having met the definition of disability under the Equality Act 2010), but were still able to receive a grade as evidence of their performance was available. We are pleased that the proposals in this consultation will allow this to continue in 2023, and believe that this should be a permanent feature of the exam system.
11. We are unclear how these proposals will be enforced, or which organisation will hold centres accountable for following them, particularly if they continue in perpetuity. As the expectation is that, in a vast majority of cases, the work produced will never be seen by the awarding organisations, it is not clear what checks and balances will be in place to ensure all centres are collecting evidence for all candidates throughout the year.

C. Answers to specific questions

Question 1: Do you agree that this proposed guidance is helpful in guiding schools and colleges to collect and retain evidence in a proportionate way in line with their existing arrangements to help determine TAGs in the unlikely event exams do not go ahead as planned? Please add any comments to explain your choice.

12. Yes.
13. The proposals set out are reasonable and proportionate. Most centres will undertake some form of mock assessment during the year, and approaching this in a broadly consistent way, and retaining the work produced, is proportionate.
14. The proposals are flexible enough to allow centres to build this into existing assessment practices and mock exam timetables. Many ASCL members have already made plans to produce and retain evidence under exam conditions, in anticipation of these proposals being announced.
15. However, this flexibility needs to be balanced against the need to ensure there is sufficient consistency for grades based on these assessments to be, and be perceived to be, fair.
16. We therefore strongly suggest that, alongside any guidance produced, JCQ should produce a cover sheet which centres can use and adapt to evidence the conditions under which evidence was produced, and the extent of the course that had been taught at the time of the assessment. We think this will be useful for centres in the eventuality of TAGs being needed for whole cohorts or for individuals.

Question 2: To what extent do you agree or disagree that the guidance set out minimises any additional burden on students beyond the existing assessment arrangements, such as mock exams, in place in centres? Please add any comment to explain your answer.

17. Disagree.
18. It is inevitable that the proposals will create an additional burden on students. As candidates should be made aware of any assessment that could be used to inform a TAG in the future, this changes the nature of the assessment and will lead to increased anxiety for some students.

19. However, the flexibility proposed, and the fact that only one assessment in each qualification is required, goes some way to mitigate this.
20. In other words, while these proposals will place an additional burden on candidates, we feel this is proportionate.

Question 3: To what extent do you agree or disagree that the guidance set out above would minimise any additional teacher workload beyond existing assessment arrangements, such as mock exams, in place in centres? Please add any comments to explain your response.

21. Disagree.
22. Because the assessments may be used to inform a TAG in case exams are cancelled, they will inevitably be more high-stakes than a mock exam in pre-pandemic years. Centres and individual teachers will naturally want to follow the guidance closely, and this will increase workload.
23. For example, whereas teachers may previously have used past papers, the requirement to ensure that candidates have not seen the assessment material before may mean that teachers feel they need to write new assessments.
24. If the proposals are taken forward, the awarding organisations should be required to produce a range of additional assessment items that can be used flexibly or adapted by centres, for each qualification. This would help to reduce the additional workload on teachers and leaders.

Question 4: Are there any parts of the guidance which you think could be improved? Please be specific about which part of the guidance you are referring to and how it might be improved.

25. Yes. More guidance in the 'conditions' or 'assessment materials' section should be given regarding how much of the course should have been studied at the time of the assessment. If TAGs are required, a candidate who was assessed towards the end of their course is likely to have higher performance than a candidate assessed midway through.

Question 5a: Should guidance remain in place beyond 2023 to support the award of grades should exams not be able to go ahead as planned for any reason in future years?

26. Yes. As stated above, ASCL Council believes that these proposals are proportionate and reasonable, and should continue.
27. However, future consultations should consider how this guidance is enforced to ensure consistency between centres.

Question 5b: Please add any comments you have on the use of guidance to build resilience in the exam system beyond 2023.

28. The Department and Ofqual should undertake a formal review into how resilience can be built into the exam system. In particular, ASCL would strongly urge a review and consultation on the use of continuous assessment within qualifications. Many ASCL members have expressed a view that some form of continuous assessment would make

the system much more resilient, and be fairer in the event that exams are cancelled in the future.

Questions 6 and 7: To what extent do you agree or disagree that this would be the best approach for private candidates? Please add any comments you have on the proposed approach, and/or any views you have on alternative approaches.

29. Agree.

30. The approach is appropriate. As in 2020 and 2021, no centre should be required to undertake TAG assessment of private candidates. The DfE should work with trusts, schools and colleges to identify providers who are willing to undertake contingency assessment of private candidates.

Question 8: Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of students because of their protected characteristics?

31. Yes. As noted above, the small number of candidates who meet the disability definition under the Equality Act and who have studied the whole course but cannot sit any papers in the summer may benefit from these arrangements, if a similar approach to 2022 is used.

Question 9: Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected characteristics?

32. Yes. As noted in the consultation, although mental wellbeing is not a protected characteristic, students who suffer from exam anxiety and pressure are likely to be negatively impacted by these proposals. Even though centres will confirm that summer exams are due to go ahead, the high-stakes nature of contingency assessments is likely to increase anxiety. However, we still maintain that, overall, these proposals are proportionate.

33. We would encourage the government to balance any further pressure these arrangements may put on students (and teachers) by doing more to reduce pressure in other ways. This should include a proper review of the impact of our high-stakes accountability system, longer-term consideration of an approach to assessment which is less reliant on terminal exams, and much more support for children and young people struggling with their mental health.

Question 10: Do you have any comments on the impact of the arrangements on particular groups of students because of their protected characteristics?

34. See answers to Questions 8 and 9 above.

Question 11: 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?

35. No. The regulatory impacts have been well identified in the consultation.

36. There is a danger that increased teacher workload as a result of the proposals may lead to poorer retention of teaching staff. As part of its regulatory impact analysis, the Department should consider the proposals in the context of its own workload protocols.

Question 12: What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting? What costs would you save? Please distinguish in your response between those costs or savings that relate to preparing to put the proposed arrangements in place, from those that would only be realised if the arrangements were required.

37. The proposals are unlikely to save any costs for schools and colleges. As acknowledged in your regulatory impact assessment, there are likely to be increased costs due to marking, quality assurance, storing of materials, and responding to student and parent queries.

38. However, these costs have been minimised by the flexibility that the guidance affords centres.

Question 13: Do you have any views on how we could reduce burden and costs while achieving the same aims?

39. The proposals are proportionate and the incurred costs and burden do not outweigh the benefits.

D. Conclusion

40. The views of the sector are split on the merits of these proposals. We have attempted to reflect this in the detailed responses to the consultation questions. However, overall, ASCL is supportive of these proposals.

41. We hope that this response 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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