

## **Ofqual consultation: “Consultation on an additional GCSE, AS and A level exam series in autumn 2020”**

### **Response of the Association of School and College Leaders**

#### **A. Introduction**

The Association of School and College Leaders (ASCL) represents over 19,000 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 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.

#### **B. General comments**

Whilst there is a case to run an autumn series from the point of view of natural justice for candidates, for private candidates, and for centres with unrecognised rapid improvement by virtue of statistical moderation approach, we believe the proposed scope, a full series in all subjects offered by all awarding organisations, is disproportionate.

There is a risk that the autumn series undermines the integrity of the centre-assessed grades (CAG) process.

There is a further risk that offering a full autumn series might appeal to some candidates who believe their grades are unreasonable and elect to take an autumn exam. Some of those candidates may then change their mind and withdraw after further reflection. An autumn series, particularly where large centres are concerned, will cause disruption to teaching and learning for those in the current year 10 and 12 who will be taking their exams in 2021. In addition, exam accommodation and management may be costly if they cannot be situated on a school or college site.

The cost of administration is likely to be disproportionate to the likely number of candidates and does not benefit the system equitably; some centres may not use the series and would effectively cross-subsidise those that do. The costs of developing exam papers, already incurred by awarding organisations, is high and should be invested in a wider cohort. Running an autumn series will reduce any net cost savings which could otherwise be returned to schools and colleges.

We see no compelling need to offer AS qualifications, with the possible exception of mathematics, since these are unlikely to form part of a progression discussion for candidates.

We support the usual offer of maths and English at GCSE. We support offering subjects at A level where grades to secure progression are key, where they strengthen candidates’

positions in securing offers at higher education institutions in 2021 and where they form part of a candidate's future employment prospects. Some students may defer degree courses; we believe few are unlikely to start courses in January 2021. Overall we believe offers made by Higher Education institutions will be lower because there is an anticipated lower demand by overseas students and student numbers are at their lowest demographic dip in this cohort.

Inclusion of Year 10 in the CAG process has reduced demand in GCSE subjects such as English Literature, Statistics and Religious Studies, the main subjects entered in centres where this is part of their curriculum.

The anticipated low number of candidates makes awarding potentially unsound.

Overall, the autumn series is potentially disruptive to the progression of students to their next phase. The need to prepare for the exams and the logistics are problematic, especially for pupils with SEND.

## **C. With regard to your specific questions**

### **1. The scope of the autumn series**

**Question: To what extent do you agree or disagree that we should require exam boards to offer exams for all of the GCSE, AS and A level qualifications this autumn they had intended to offer in the summer?**

#### **DISAGREE**

ASCL believes that A levels form a significant part of a student's future aspirations and progression and that in this respect they are different from GCSE courses. We therefore see a stronger case to offer A levels as part of the autumn series than GCSEs.

**Question: To what extent do you agree or disagree that an exam board that receives no entries for a qualification by its entry deadline can withdraw the exams for that qualification from the exam timetable?**

#### **AGREE**

Recognising the needs of candidates as the primary consideration, there should be an agreed minimum number of entries nationally to facilitate awarding, It is hard to see how awarding could be reliable nationally with a few candidates.

**Do you have any comments on our proposal to require the exam boards to offer exams in every GCSE, AS and A level subject in autumn 2020?**

### **2. Should the form of the exam papers be the same as those normally taken in a summer exam series?**

**Question: To what extent do you agree or disagree that for the autumn series the same number of exams should be taken by students as they would have taken if the summer exams had not been cancelled?**

#### **AGREE**

**Question: To what extent do you agree or disagree that the exams taken in the autumn series should be in the same form for each qualification as those normally taken in the summer series?**

**AGREE**

**Do you have any comments on our proposal that students taking the autumn exams should take the same number of exams in each subject as they would have taken if the summer exams had not been cancelled and that the exams should be in the same form as the ones they would have taken in the summer?**

### **3. Should non-exam assessment be taken into account in the autumn series?**

**Question: To what extent do you agree or disagree that, with the exception of art and design, grades for GCSE, AS and A level awarded in the autumn should be based only on students' performance in their exams, with no non-exam assessment?**

**DISAGREE**

**Do you have any comments on our proposed approach to basing grades for the autumn on students' exam performance only?**

The exclusion of NEA may disadvantage some pupils over others. There are particular issues in performing arts subjects where the performance in an exam may not reflect the candidate's true ability in the subject. For example, there is little correlation between candidates' performance in the separate components of A level Music; using only a written exam will distort the results. This is also likely to be the case for other subjects.

We are mindful of the practical issues behind this proposal. How NEA can be delivered as part of the autumn series is highly problematic. Nevertheless the fact that excluding NEA completely alters who would receive the higher grades means there is more work needed on the proposal, including the potential inclusion of teacher assessment, perhaps through a CAG process, to complement the exam component.

**Question: To what extent do you agree or disagree that grades for GCSE, AS and A level art and design awarded in the autumn should be based on a new task completed under supervised conditions?**

**DISAGREE**

It would not be necessary to design a new task. Existing preparation material would suffice. It is debatable whether awarding organisations have enough time to create a new task and whether students would then have sufficient preparation time for that task. Whilst some students may have already started to prepare for the existing task, there is no limit on preparation time under current arrangements.

**Question: To what extent do you agree or disagree that any new task for GCSE, AS and A level art and design should be set and marked by the exam board?**

**NEITHER**

This is predicated on removing NEA. In general, art and design is best assessed in the way it is at the moment.

**Do you have any comments on our proposed approach to the assessment of GCSE, AS and A level art and design in the autumn 2020 series?**

There are serious concerns about the implications for the use of art facilities in schools and colleges given the likely social distancing arrangements which will persist through the autumn term.

#### **4. Separately reported results and grades**

**Question: To what extent do you agree or disagree that exam boards should carry forward the outcome of the practical skills assessments for students who takes exams in A level biology, chemistry, physics and/or geology in the autumn?**

**AGREE**

**Do you have any comments on our proposed approach to A level biology, chemistry, physics and geology practical skills assessment outcomes for the autumn?**

**Question: To what extent do you agree or disagree that exam boards should carry forward the outcome of the GCSE English language spoken language assessment for students who take exams in the qualification in the autumn, as in any other year?**

**AGREE**

However it is not clear whether the spoken language assessment components would have been completed by all centres before lockdown.

**Do you have any comments on our proposed approach to the GCSE English language spoken language assessment outcomes for the autumn?**

#### **5. The timing of the autumn exam series**

**Question: To what extent do you agree or disagree that we should put in place provisions that allow the exam boards to offer exams from October 2020, with the exact start and finish dates being confirmed by us when the position on the re-opening of schools and colleges is clearer?**

**AGREE**

**Question: To what extent do you agree or disagree that we should build some flexibility into our regulatory framework to enable us to vary the start and finish dates of the series if that is necessary because of the public health situation?**

**STRONGLY AGREE**

**Do you have any comments on the preferred timing of the autumn exam series?**

**Where should the exams take place?**

There is a need for venues which do not impact on schools and colleges. A local/regional hub model has merit.

## **Which result will stand?**

We agree the higher result should stand.

## **6. Reviews of marking and appeals**

**Question: To what extent do you agree or disagree that the normal review of marking, moderation and appeal arrangements should apply to the autumn exam series?**

**STRONGLY AGREE**

**Do you have any comments on our proposal that the normal reviews of marking and appeals arrangements should apply and, if needed, the normal reviews of moderation arrangements?**

## **7. Certificates**

**Question: To what extent do you agree or disagree that we should amend our rules to allow an exam board to issue a replacement certificate to a student to show either their calculated grade or their grade from the autumn exam series, but not require them to do so?**

**AGREE**

**Do you have any comments on our proposal to allow exam boards to issue replacement certificates to students?**

This is a matter for exam boards but should be consistent. We suggest this is dealt with by JCQ.

## **8. Project Qualifications**

**Question: To what extent do you agree or disagree that we should not impose any additional requirements on the exams boards that award the EPQs?**

**AGREE**

**Do you have any comments on our proposal that we should not impose any additional requirements on the exams boards that award the EPQs?**

## **9. The Advanced Extension Award**

**Question: To what extent do you agree or disagree that we should not impose any additional requirements on the exam board that offers the Advanced Extension Award?**

**AGREE**

**Do you have any comments on our proposal that we should not impose any additional requirements on the exam board that offers the Advanced Extension Award?**

## **Equality Impact Assessment**

**Question: Are there other potential equality impacts that we have not explored? What are they?**

**We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated.**

We would expect that the impact of Covid-19 across different students will continue into the autumn. Some candidates will have been more disadvantaged than others and will therefore be less able to engage with the autumn series.

## **Regulatory Impact Assessment**

**Questions:**

**Are there additional activities associated with the delivery of an additional exam series in the autumn that we have not identified above? What are they?**

**What additional costs do you expect you will incur as a result of an autumn exam series?**

Centres will incur costs around invigilation. They will suffer from reduced refunds/credit by the proposed scope of the autumn series as awarding organisations will incur high costs for few candidates.

Centres may be more inclined to use the autumn series if their own financial circumstances permit it, dependent on decisions regarding fees for the series. This may advantage some candidates over others.

**We would welcome your views on any suggestions for alternative approaches that could reduce burden and costs.**

We would suggest a more proportionate approach to the autumn series. Ofqual should work with the exam boards to find the smallest set of exams which accommodates the candidates who are most disadvantaged but without assuming a full series offered by all boards.

## **Conclusion**

We are grateful for the opportunity to contribute to this call for evidence.

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

Duncan Baldwin  
Deputy Director of Policy  
Association of School and College Leaders

5 June 2020