

## **Ofqual consultation: Proposed changes to the assessment of GCSEs, AS and A levels in 2021**

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

#### **A. Introduction**

The Association of School and College Leaders (ASCL) represents over 20,000 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**

While the set of proposals contained in this consultation may go some way to generating extra teaching time, ASCL believes that the issues around the 2021 series of exams cannot be properly addressed by what amounts to a number of relatively minor adjustments and mitigation strategies.

ASCL members have two major areas of concern with the proposals in the consultation as it stands. The first is that they do not go far enough in recognising the disruption to learning that many students have already faced – and the fact that some students will have experienced a much greater degree of disruption than others. The second is that they do not sufficiently recognise and plan for likely further disruption to learning over the period between now and the 2021 exam season – and indeed potentially over the exam season itself.

On the first point, there is clearly a need to balance upholding the standards of this year's exams while recognising that the experience of many students this year will have been profoundly affected by the public health crisis. ASCL has held detailed discussions with representatives of the major awarding organisations about ways in which that balance might be achieved. We recognise that this is extremely challenging, and that there are no simple solutions.

We support the principle in the consultation that content should not be reduced. Reducing content is undesirable because different centres will have approached their teaching in different orders. This could, therefore, disadvantage students who have already studied content which is removed. It is also problematic in terms of students' progression, particularly at A and AS level.

We would, however, like to see more consideration given to increased choice within exams. As outlined in our response to the specific question on this issue below, we recognise that there are many potential unintended consequences with introducing more choice of topics.

This could, in some cases, exacerbate the very problem it seeks to address, by further disadvantaging those students most affected by the crisis. We would, however, like to see more thought given to how these potentially negative consequences could be mitigated. The consultation does propose introducing more choice into history exams. We would encourage Ofqual and the awarding bodies to consider different – potentially radical – ways in which greater choice could be fairly and effectively introduced in other subjects.

We would also like to see more consideration given to different approaches to exams, to recognise the fact that students will have had less time this year to learn the large amount of content required. These could include the use of open book exams in English, or the provision of formula sheets in maths and science exams.

On our second major concern – that these proposals do not sufficiently recognise and plan for likely further disruption to learning – we believe Ofqual should have gone much further. It must be more clearly acknowledged that the ongoing impact of the virus leading towards the 2021 series is unknown and that suitable contingency plans need to be ready alongside these proposals. Those plans need to address a range of scenarios from no new serious outbreaks, through intermittent local outbreaks up to and including repeated national lockdown, potentially over the exam period itself.

There must be approaches introduced to support students who may not be able to sit exams because of local lockdowns. These approaches might involve a parallel centre-assessed grading process, similar to that used in 2020, which could be used to inform a student's grades in the event of them not being able to sit an exam as planned. They might involve staged assessment opportunities, so that students could 'bank' a proportion of their grade over the course of the year. Schools need to plan now for any such contingencies, as any approach would be likely to involve teachers collecting evidence over the year.

We understand that some of the suggestions made above have already been considered, and dismissed, as part of the process of developing this consultation. Our view, however, is that a much broader range of options and mitigation strategies should be formally discussed and consulted upon, in order to properly inform the final agreed approach.

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

**Question: To what extent do you agree or disagree that centres should have a choice of topics on which their students will answer questions for GCSE history and GCSE ancient history exams in 2021?**

Agree.

**Question: To what extent do you agree or disagree with the proposed assessment arrangements for GCSE history and GCSE ancient history exams in 2021 as set out in annex C?**

Agree.

**Question: Do you have any comments on the proposal to allow centres a choice of topics on which their students will answer questions for GCSE history and GCSE ancient history exams and/or on any of the proposed assessment arrangements for particular specifications in 2021?**

We can see that introducing an element of choice into history and ancient history exams is more straightforward than may be the case in other subjects, since a broadly similar set of

historical skills can apply to different periods. But given the assertion that standards would not be unduly affected, the logical conclusion is that the content of those qualifications was too high in the first place, a view widely rehearsed since reform. We hope this may signal significant review of the content in history in subsequent years.

There are other subjects where content is believed to be too high, such as RS. The fact that no other subjects have been identified in this way seems inconsistent.

We also, as outlined in our general comments above, would like to see more consideration given to the introduction of choice in other subjects, even if this may require some radical thinking about how to do so fairly and effectively.

**Question: To what extent do you agree or disagree that students taking GCSE geography exams in 2021 should not be required to undertake or be assessed on fieldwork?**

Neither agree nor disagree.

**Question: Do you have any comments on the proposal to remove the fieldwork requirement and exam questions relating to fieldwork from GCSE geography exams in 2021?**

We agree that undertaking fieldwork is untenable under the circumstances. However we believe it is possible to simulate questions about fieldwork in a similar way to proposals for science practicals via the use of video and interactive tools. We would encourage awarding organisations and the regulator to consider this. Fieldwork in geography is similar in some ways to non-examined assessment in practical subjects; removing it changes the character of the assessment.

If fieldwork is removed it needs to be made clear whether more of the unaffected content will be examined in order to maintain lengths of papers, or whether content will simply be reduced.

**Question: To what extent do you agree or disagree that the 2021 exams should not include more optional questions than usual?**

Disagree.

**Question: Do you have any comments on the use of optional exam questions in the 2021 exams?**

ASCL has taken extensive advice from assessment experts about optional exam questions. We understand the concerns that optionality may serve to disadvantage the very candidates it is intended to support. Having a range of options to choose from allows candidates who have been able to complete courses relatively unscathed to choose which questions they think they can answer most effectively – a benefit not open to students who may not have studied all the optional topics. We are also aware that papers with optional elements can be harder to navigate, which can lead to students making errors in how they respond, and that setting optional questions of equivalent difficulty generates increased complexity in standard setting.

However, we are disappointed that Ofqual and the awarding bodies appear to have decided, with the exception of history, that these problems are unsurmountable. We recognise the challenges involved, but believe that the alternative – that students may find themselves in the position of having to answer a question on a topic they have barely covered – is untenable.

We would urge Ofqual and the exam boards to give serious consideration to how the problems with optionality could be overcome, to go some way towards recognising the very different educational experience this year's cohort will have had.

**Question: To what extent do you agree or disagree that the number of exams taken for each subject in 2021 should be the same as usual?**

Disagree.

**Question: Do you have any comments on the number of exams taken for each subject in 2021?**

We believe that this decision should be taken on a subject-by-subject basis. For some subjects, it may be possible to reduce the number of exams without compromising the integrity of the assessment. For others, the compromise involved may be too great.

**Question: To what extent do you agree or disagree that the exams taken in 2021 should not be longer than usual?**

Agree.

**Question: Do you have any comments on the length of exams in 2021?**

Increasing the length of exams risks introducing more problems than it solves, and further disadvantaging those students already most affected by the disruption to learning.

**Question: To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 if results can still be released on 26 August 2021?**

Agree.

**Question: To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

Disagree.

**Question: What would be the advantages and disadvantages of delaying the start of GCSE exams in 2021?**

We are aware that delaying the start of the exam period could create a number of risks to the awarding process, as well as organisational issues for some centres. It could cause issues around the supply of markers for exam papers as a longer part of the summer holiday would need to be set aside for this. A later exam results day could lead to difficulty in processing enrolment at further education institutions. Some centres may have already returned for their autumn term which would cause administrative problems managing a later results day. Some exams officers may have changed posts during this time, leaving a new postholder to manage the most complex activity immediately on starting their new role.

However, delaying the start of exams would obviously give students longer to cover the necessary content. The time gained would not fully compensate for time lost in the spring and summer terms, but it would go some way towards recognising this.

On balance, therefore, if the start of GCSEs can be delayed while managing the associated risks and without impacting on the release of results, we believe this should be done.

**Question: To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 if results can still be released on 19 August 2021?**

Agree.

**Question: To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

Disagree.

**Question: What would be the advantages and disadvantages of delaying the start of A level and AS exams in 2021?**

See our comments in relation to GCSEs above. The same advantages and disadvantages apply, in our view, to A level and AS exams.

It is, however, particularly important that there is no delay to the release of A and AS level results. In addition to the problems with this mentioned above, a later A and AS level results day would affect the appeals process. Given that there may be increased deferrals from 2020, this could increase competition for courses with high entry tariffs, resulting in some candidates losing a place.

As with GCSEs, therefore, we would welcome a delay to the start of the A and AS level exams, but only if this could be done while managing the associated risks and without delaying the release of results.

**Question: To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?**

MFL: While we support the proposal to change the speaking component of modern languages to an endorsement, there needs to be clarification over the weighting of the remaining components.

### **Equality impact assessment**

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

As mentioned above, the consultation is unhelpfully silent on what we regard as one of the most serious issues, namely how to mitigate against the ongoing but unknown impact of Covid-19 through 2020 and 2021.

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

While we agree with the intention to run as full a series as possible in 2021, we cannot be sure that students will be able to access these exams as individuals, in particular geographical areas or, potentially, nationally. There is an urgent need to address this because schools need to plan accordingly.

We believe it is necessary to have a set of teacher judgements available to support those students who may be unable to take exams. This could take the form of a centre-assessed grading process similar to 2020, but it needs to be supported by more secure assessments. There are a number of possibilities here and Ofqual might consider working with the exam boards to investigate, for example, if externally marked assessments could be made available

to help centres construct a rank order. There will be unused GCSE papers in mathematics and English which would provide a valuable resource.

## **D. Conclusion**

We are grateful for the opportunity to contribute to this consultation.

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.

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Association of School and College Leaders

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