

Department for Education and Ofqual consultation on how GCSE, AS and A level grades should be awarded in summer 2021

Response and proposals from the Association of School and College Leaders

January 2021

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.

ASCL welcomes the opportunity to contribute to this consultation. We have consulted widely with our members and provide the response below on their behalf.

B. General response to the consultation

Strengths of the consultation

There is much in the consultation that is welcome. This includes:

- The principle of assessing students relatively late in the summer term – to maximise time for teaching and learning, and maintain student engagement and motivation.
- The recognition that assessment this year needs to be based on what students have actually been taught – and that some students will have had more opportunity to complete the whole course than others.
- The proposal that teachers should draw on a broad range of assessment – with guidance from exam boards about what this might include.
- The provision of training and support for schools and colleges on how to assess – to encourage consistency.
- The idea that this support from exam boards might include some form of externally set assessment.
- The recognition that this plan needs to include provision for the worst-case scenario, i.e. some or all students not in school or college in May/June.
- The inclusion of a robust quality assurance process, to ensure consistency and inspire confidence among students and families.
- The recognition that there needs to be an appeals process.

ASCL's concerns

However, there are also aspects of the proposals, as set out in the consultation, which concern us. These include:

- The potential for the solution to be overly complex, in a year in which it needs to be as clear, simple and straightforward as possible.
- The potential for external assessments to be perceived as exams by another name, when the government has assured students that exams will not go ahead.
- The potential for a significant increase in grades, which we do not believe is in students' best interests.
- Insufficient incentives for all schools and colleges to submit carefully evidenced grades.
- Insufficient recognition of the impact of differential learning loss on students' performance.
- The proposal that the appeals process should be led by schools and colleges, rather than exam boards.
- The impact on the workload of leaders and teachers, and the potential for the plans as they stand to require significant input from schools and colleges over the summer break.

C. ASCL's proposed approach

Our proposed approach is outlined below. This incorporates the proposals in the consultation which we believe are helpful and appropriate, and seeks to address those we feel are problematic. It is not perfect – no solution will be. However, we feel it has significant merit.

1. For now, teachers should keep teaching the curriculum, undertaking ongoing assessment of students, and sharing the results of those assessments with students, as they normally would.
2. Exam boards should produce resources and guidance to help teachers refine their current ongoing assessments into final submitted grades. These should be provided to schools and colleges as soon as possible. They should include the following:
 - a. A clear indication of what each grade means this year, i.e. the criteria that centres should use to determine their submitted grade for each student in each subject.
 - b. Information about how the school or college performed in each subject in 2017-19, together with prior attainment information for this year's cohorts. Centres should be encouraged to use this information as a reference point – but not a cap – as they determine their submitted grades. We suggest using 2017-19, rather than including 2020, because including results from 2020 risks further compounding the differences in how different schools and colleges approached the centre-assessed grade process last year.

It's important to note that we are not suggesting that centres should not be able to submit grades which differ from their previous performance, if they have good reason to do so. We would suggest, however, that centres submitting grades which are significantly different from their profiles in previous years should be asked to provide more extensive evidence to justify that difference. See point 5 below for more on this.

Centres anticipating submitting grades which are significantly different from their previous performance could be encouraged to discuss this with the exam board in advance, in order to pre-empt later discussions.

- c. A range of sample papers and/or banks of questions, with accompanying mark schemes, which schools and colleges should be encouraged to use to ensure their submitted grades are as robust, reliable and consistent with those submitted by other centres as possible. Papers/questions should be included on a wide range of content from the specification, so that centres can choose those which focus on content which their students have been taught, however disrupted their learning has been.

Schools and colleges should be encouraged to ask students to undertake these sample papers/questions under reasonably controlled conditions if possible, to increase their confidence that they represent a student's own work. However, they should not be treated as 'mini-exams'. There should be no expectation that students come to these tasks unseen, or that all students sit them at the same time.

The use of these papers/questions should be encouraged, rather than mandated. They will be helpful in determining submitted grades, and may provide particularly useful in the case of appeals. However, there may be some circumstances in which the use of these materials may not be appropriate, such as if some or all students are not able to return to face-to-face education for many more weeks.

The results of these papers/questions should not be given a set weighting, but should be used flexibly by centres as part of their evidence for the grades they submit.

- d. A clear indication of what other types of work, alongside the exam board-created materials, that schools and colleges could use as evidence for submitting grades.
- e. A clear indication of what period this evidence could cover. We would suggest that this evidence should, by default, be drawn from students' more recent work (e.g. that undertaken in the spring and summer terms, plus any assessments taken at the end of the autumn term). However, where a student's performance has been particularly badly affected by more recent circumstances (e.g. a lack of a suitable device on which to access work during the spring term lockdown), centres should be able to draw on earlier work as well.
- f. A clear indication of how much of each course this evidence should be based on. We suggest that, in the vast majority of cases, centres should aim to base a student's assessment on work which covers at least half of a specification's assessment objectives. This would enable them to feel confident that a student was performing at that level, whilst allowing for the fact that some students may not have been taught a significant proportion of the course. For some subjects, particularly those such as maths and modern foreign language in which knowledge and skills build cumulatively through the course, boards may need to specify the inclusion of work which addresses particular assessment objectives.
- g. Clarity over how and when special consideration could be applied to students whose performance over the period has been particularly badly affected by Covid-19 or other issues. This would enable centres to submit grades for the (probably very small) number of students who have been taught less than half of the course, and also to recognise the fact that a small number of students will have had to overcome even greater obstacles than their peers this year.
- h. Advice and training on minimising unconscious bias in assessing students and determining grades.

3. Exam boards should work together to ensure they are approaching all of the above in a consistent way, to encourage fairness across the system. Ofqual should oversee this process, and ensure it is content that there is sufficient consistency.
4. Schools and colleges should draw this evidence together for each student, and submit grades to the exam boards by mid June.
5. The boards should quality assure these submitted grades, satisfying themselves that the centre has followed the agreed process. This quality assurance process should include comparison of the submitted grades with the centre's historical performance and prior attainment data. If the submitted grades are similar to the centre's prior performance and attainment, in the vast majority of cases the board should agree to award these to students as they stand.
6. If a school or college's submitted grades are significantly different from the centre's previous performance, and the centre has not already discussed this with the board, the board should then initiate a discussion about this. They should ask for evidence (perhaps providing a business case template to structure this) for why the centre believes this year's cohort is significantly different. Differences could arise for a number of reasons, including a school or college being on a demonstrably upward trajectory, small centres with very different cohort patterns year-on-year, or schools and colleges where there has been significant demographic change (e.g. moving from single sex to co-ed). Evidence from the externally set sample papers / questions, if used, could be particularly helpful in supporting a centre's judgement.
7. If the board is happy with this evidence, they should agree to award these grades to students.
8. If the board is not happy with this evidence, they should ask the school or college to adjust their submitted grades, providing a suggested range of grades, or similar, to which the centre would apply a ranking exercise.
9. The school or college should then resubmit their adjusted grades, with an explanation of the changes they've made, and why. The board should either accept these or ask the centre to refine their process until they are comfortable with it, then agree to award those grades to students.

This process should be completed by mid July.

10. The boards should release grades to schools and colleges a week before the normal results days. Centres should then have the opportunity to point out any errors (there shouldn't be any surprises at this stage, as the boards should have confirmed, through the process outlined above, when they have accepted a centre's submitted grades).
11. The boards should correct any errors pointed out by centres.
12. The boards should release the grades to students on the normal results days, i.e. 12 and 19 August.
13. Any student unhappy with their grade should be able to appeal to the board, which will investigate the appeal.

D. Other considerations

Depending on the outcomes of the consultation, it may be appropriate to run an additional, short consultation on the appeals process, as the details of how this should work will depend on the process of awarding grades.

The Department for Education should immediately commission independent subject reviews into lost learning. These should identify the areas of GCSE, AS, A level and VTQ course content that have been studied in the least depth nationally. The findings should be shared with colleges and universities as soon as possible to inform their curriculum planning for the new academic year. This will ensure that students most affected by the pandemic are not at a disadvantage when they begin their next stage of education.

The government must confirm as soon as possible that Key Stage 4 and post-16 data in 2021 will not be used for any accountability purposes.

The cohorts of students due to sit exams in 2022 (typically current Year 10s and Year 12s) will have been equally, if not more, affected by the pandemic than this year's cohorts, and will also have experienced differential loss of learning. The Department for Education and Ofqual must consult on proposals for the summer 2022 series of exams as soon as possible.

E. Responses to specific questions

Our answers to your specific questions are attached below as an appendix. We have also responded to these questions online.

There are a few questions to which we have answered 'Neither agree nor disagree'. We have answered in this way where we reject the premise on which the question is based. Our reasons for this should be clear from reading our proposed approach above.

F. 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.

Julie McCulloch
Director of Policy

Tom Middlehurst
Curriculum and Inspection Specialist

Association of School and College Leaders
29 January 2021

Appendix – responses to specific questions

What grades will mean

1. To what extent do you agree or disagree that the grades awarded to students in 2021 should reflect the standard at which they are performing?

Agree

When teachers should assess the standard at which students are performing

2. To what extent do you agree or disagree that the alternative approach to awarding grades in summer 2021 should seek to encourage students to continue to engage with their education for the remainder of the academic year?

Strongly agree

3. When would you prefer that teachers make their final assessment of their students' performance?

May / June

4. To what extent do you agree or disagree that teachers should be able to use evidence of the standard of a student's performance from throughout their course?

Agree

5. Should there be any limit on the period from which previous work could be drawn?

Yes

6. If you answered 'yes', what should that limit be?

12 months

7. Do you have any comments on when students should be assessed?

Students should be motivated to learn for as long as possible, therefore final assessments should be made as late in the summer term as possible, whilst still ensuring results days are no later than usual, and there is sufficient time for a rigorous and iterative quality assurance process, as set out in ASCL's proposal. Schools and colleges should be able to exercise professional judgement in how they use assessment evidence from throughout a student's course.

The use of exam board papers

8. To what extent do you agree or disagree that the exam boards should provide a set of papers to support teachers in assessing their students' work?

Agree

9. Do you think the use of the papers provided by the exam boards should be compulsory or optional, for GCSEs, AS and A levels?

Optional for all

10. To what extent do you agree or disagree that any papers provided by the exam boards should include questions that are of a type that is familiar to students?

Strongly agree

11. To what extent do you agree or disagree that if teachers use exam board papers they should have choice about the topics covered in the questions their students answer, for example through choice of which papers they use with their students from the set of papers provided?

Strongly agree

12. To what extent do you agree or disagree that teachers should be required to assess (either by use of the exam board papers or via other evidence) a certain minimum proportion of the overall subject content, for each subject?

Strongly agree

13. To what extent do you agree or disagree that teachers should mark any papers their students are asked to complete?

Neither agree nor disagree

14. Do you have any comments on the use of exam board papers?

Exam boards should produce a range of sample papers and/or banks of questions, with accompanying mark schemes, which schools and colleges should be encouraged to use to ensure their submitted grades are as robust, reliable and consistent with those submitted by other centres as possible. Papers/questions should be included on a wide range of content from the specification, so that centres can choose those which focus on content which their students have been taught, however disrupted their learning has been.

Schools and colleges should be encouraged to ask students to undertake these sample papers/questions under reasonably controlled conditions if possible, to increase their confidence that they represent a student's own work. However, they should not be treated as 'mini-exams'. There should be no expectation that students come to these tasks unseen, or that all students sit them at the same time.

The use of these papers/questions should be encouraged, rather than mandated. They will be helpful in determining submitted grades, and may provide particularly useful in the case of appeals. However, there may be some circumstances in which the use of these materials may not be appropriate, such as if some or all students are not able to return to face-to-face education for many more weeks.

Subjects with non-exam assessment and separately reported results and grades

15. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in full for a subject?

Agree

16. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in part for a subject?

Agree

17. To what extent do you agree or disagree that teachers should mark their students' non-exam assessments?

Agree

18. To what extent do you agree or disagree that the marking of non-exam assessments should not be moderated by the exam boards this year?

Neither agree nor disagree

19. Do you have any comments on the use of non-exam assessment and separately reported results and grades?

As with other forms of assessment, schools and colleges should exercise professional judgement in how they use NEA in final grading, with common advice and guidance from exam boards.

Other performance evidence

20. To what extent do you agree or disagree that a breadth of evidence should inform teachers' judgements?

Strongly agree

21. To what extent do you agree or disagree that the provision of training and guidance from exam boards should support teachers to reach their assessment of a student's deserved grade?

Strongly agree

22. To what extent do you agree or disagree that teachers should be able to take into account other performance evidence for a student before submitting a grade?

Strongly agree

23. To what extent do you agree or disagree that performance evidence from closer to the time of the final assessment, should carry more weight in determining a student's final grade?

Neither agree nor disagree

24. Do you have any comments on the use of other performance evidence?

Exam boards should provide clear advice and guidance for schools and colleges, as well as for students and parents, on how performance evidence could be collated and interpreted. The final submitted grade must be based on a centre's professional judgement.

The assessment period

25. To what extent do you agree or disagree that all students should be assessed within a given time period for each subject – whether or not their school or college must or is using exam board papers?

Disagree

26. To what extent do you agree or disagree that exam boards should publish all of their papers shortly before the assessments in order to manage the risk of some students being advantaged through papers being leaked?

Disagree

27. Do you have any comments about the assessment period for the use of exam board papers or teacher devised assessments?

As we do not think exam board papers should be mandatory, our view is that schools and colleges should be able to use ongoing assessment practices until the deadline for submitting grades.

The conditions under which students should be assessed

28. To what extent do you agree or disagree that the assessments should, if possible, be taken within the student's school or college?

Neither agree nor disagree

29. To what extent do you agree or disagree that if the pandemic makes it necessary a student should be able to take their assessments at an alternative venue, including at home?

Strongly agree

30. Do you have any comments on the conditions under which students should be assessed?

As we believe the use of exam board papers should be optional and flexible, our view is that schools and colleges should have flexibility in the conditions under which any assessments are made. They should use professional judgement in making inferences about what assessment data shows, with advice from exam boards.

Supporting teachers

31. To what extent do you agree or disagree that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements?

Strongly agree

Internal quality assurance

32. To what extent do you agree or disagree that the exam boards should set requirements for school and college internal quality assurance arrangements and should provide guidance on these requirements to support centres?

Strongly agree

33. To what extent do you agree or disagree that the head of a school or college should make a declaration to the exam board confirming its requirements had been followed and teachers had regard to the guidance and support materials provided?

Agree

34. Do you have any comments about internal quality assurance?

The exam boards should provide centres with information about how the school or college performed in each subject in 2017-19, together with prior attainment information for this year's cohorts. Centres should be encouraged to use this information as a reference point – but not a cap – as they determine their submitted grades. We suggest using 2017-19, rather than including 2020, because including results from 2020 risks further compounding the differences in how different schools and colleges approached the centre-assessed grade process last year.

It's important to note that we are not suggesting that centres should not be able to submit grades which differ from their previous performance, if they have good reason to do so. We would suggest, however, that centres submitting grades which are significantly different from their profiles in previous years should be asked to provide more extensive evidence to justify that difference. See point 5 below for more on this.

Centres anticipating submitting grades which are significantly different from their previous performance could be encouraged to discuss this with the exam board in advance, in order to pre-empt later discussions.

External quality assurance

35. To what extent do you agree or disagree that the exam boards should quality assure how schools and colleges are determining grades?

Strongly agree

36. To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

Strongly agree

37. To what extent do you agree or disagree that the exam boards should sample, at subject level, the evidence on which the submitted grades were based?

Strongly agree

38. To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

Agree

39. To what extent do you agree or disagree that exam boards could only change a student's grade after a review of the evidence and discussion with the school or college?

Strongly agree

40. Do you have any comments about external quality assurance?

The boards should quality assure submitted grades, satisfying themselves that the centre has followed the agreed process. This quality assurance process should include comparison of the submitted grades with the centre's historical performance

and prior attainment data. If the submitted grades are similar to the centre's prior performance and attainment, in the vast majority of cases the board should agree to award these to students as they stand.

If a school or college's submitted grades are significantly different from the centre's previous performance, and the centre has not already discussed this with the board, the board should then initiate a discussion about this. They should ask for evidence (perhaps providing a business case template to structure this) for why the centre believes this year's cohort is significantly different. Differences could arise for a number of reasons, including a school or college being on a demonstrably upward trajectory, small centres with very different cohort patterns year-on-year, or schools and colleges where there has been significant demographic change (e.g. moving from single sex to co-ed). Evidence from the externally set sample papers / questions, if used, could be particularly helpful in supporting a centre's judgement.

How students could appeal their grade

41. To what extent do you agree or disagree that students should not be told the grade their teacher has submitted before results day?

Strongly agree

42. To what extent do you agree or disagree that students should be able to appeal their grade on the grounds that their teacher made an error when assessing the student's performance?

Neither agree nor disagree

43. To what extent do you agree or disagree that the school or college should consider the appeal?

Strongly disagree

44. To what extent do you agree or disagree that the appeal should normally be considered by a competent person within the student's school or college who was not involved with the original assessment?

Neither agree nor disagree

45. To what extent do you agree or disagree that a school or college should be able to appoint a competent person from outside of the school or college to consider the appeal?

Neither agree nor disagree

46. To what extent do you agree or disagree that a grade should only be changed if it is found not to represent a legitimate exercise of academic judgement?

Agree

47. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not follow the exam board's requirements when it assessed the student's performance?

Agree

48. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not properly consider the student's appeal?

Neither agree nor disagree

49. To what extent do you agree or disagree that we should seek to bring forward results day(s), in order for appeals to begin earlier?

Disagree

50. To what extent do you agree or disagree that if results day(s) are brought forward, we should seek to decouple when a student is informed of their results, and universities are informed of their formal result for the purpose of admissions decisions?

Disagree

51. To what extent do you agree or disagree that the exam boards should provide information for schools and colleges on how they should handle appeals?

Agree

52. Do you have any comments on the proposed appeal arrangements?

As exam boards are the responsible bodies for awarding grades, appeals should be handled by exam boards. It may be necessary to undertake an additional, short consultation on appeals following the wider response to this consultation, to determine exactly how this process should work.

Private candidates

53. To what extent do you agree or disagree that private candidates should be able to complete the papers set by exam boards, with them marked by the exam boards?

Agree

54. To what extent do you agree or disagree that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college's other students?

Disagree

55. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?

Strongly disagree

56. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021

Neither agree nor disagree

57.: Do you have any comments on the options for how grades should be made available to private candidates?

It is unlikely, in the majority of cases, that schools and colleges will feel confident that they can reliably determine grades for private candidates. It is important, therefore, that the exam boards are able to devise a process by which they can assess private candidates themselves, probably by using the sample papers / banks of questions they also make available to schools and colleges.

58. If the preferred option for private candidates is an exam series, should any other students be permitted to enter to also sit an exam?

No exam series should be made available to any candidates this summer.

Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world

59. Should the exam boards be prohibited from offering GCSE, AS and A level exams in any country in 2021?

Yes

60. If you answered no, which students should be allowed to enter for them?

N/A

Equality impact assessment

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

Yes

62. If you have answered 'yes' please explain your reason for each proposed arrangement you have in mind.

Holistic assessment of students will allow for a broader range of evidence than is currently used in examinations.

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

Yes, there is potential for conscious and unconscious bias in the process of awarding grades.

64. If you have answered 'yes' please explain your reason and suggest how the negative impact could be removed or reduced for each proposed arrangement you have in mind.

Exam boards should provide training and support on unconscious bias to help inform school and college's assessment and internal quality assurance.

Regulatory Impact Assessment

65. 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?

N/A

66. What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting?

Schools and colleges may incur additional costs due to the potential need for teachers to mark external assessments this summer term, and in responding to appeals.

67. What costs would you save?

Depending on the administration of any external assessments, schools and colleges may make savings on exam invigilation costs, although the impact of this must be fully explored. Any savings made by the exam boards should be returned to schools and colleges, with the option of either being credit on account or claiming cash back.

68. We would welcome your views on how we could reduce burden and costs while achieving the same aims.

Significant burden, and in turn increased costs, were incurred last summer by the government's decision to change the awarding of grades after calculated grades had been published by the exam boards. A similar situation this summer must be avoided all costs.

ENDS