

## **CCEA Consultation on proposed changes to the assessment of CCEA GCSE, AS and A Level Qualifications for Summer 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. In Northern Ireland the association has approximately 200 members in more than 80 schools, across all sectors, the total enrolment of which equates to almost half of all pupils in secondary education and includes some of the largest schools in the Province. As a branch of the national association, ASCL(NI) is able to contribute independently to the debate on education in the Province on behalf of its members and the children it serves. We work to shape education policy, provide advice, and support to members and deliver high quality professional development across the sector. 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**

ASCL recognises the importance of any assessment system being fair to students and also in maintaining standards. The experiences of 2020 mean big questions have to be asked about what standards are. Grades awarded to students should, as far as possible, not compromise students' individual abilities nor the achievements of cohorts prior to 2020 or those beyond a Covid-19 dominated world. It is important, however, that the unique circumstances which the current cohort of students find themselves in is reflected in any curriculum and assessment adjustments and that the pastoral needs of the pupils due to undertake GCSEs, AS and A levels in 2021 are fully understood and reflected in any revisions. We welcome CCEA's commitment to 'make things better for young people and their teachers'. While the integrity of the system is important, the system cannot be protected at the expense of the individual student.

Significant lessons have been learned from the awarding of grades in 2020, and we contend that the fairest system for all is to make examinations work in 2021. Efforts to award grades in 2020, in part using an algorithm, based on pre-existing data and teacher judgements, proved to be flawed.

We note and welcome that nowhere in the consultation document is there any proposal to revert to any form of 'calculation' of grades for 2021.

We do, however, make comment in our response for the need to have contingency plans in place in the event of significant disruption during the 2021 examinations sessions. We welcome the comment that further work is being taken forward to consider contingency arrangements to deal with a range of potential public health scenarios, including local lockdowns. 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. We believe that it is essential that due consideration is given to how to mitigate against the ongoing, but unknown, impact of Covid-19 through the remainder of 2020 and 2021, to enable an examination series to be held in the summer of 2021, with relevant modules during the course of the year in English Language and Mathematics, as previously scheduled. Already schools are experiencing pupils having to isolate as a result of them displaying Covid-19 symptoms and this will sadly, but almost inevitably, escalate. We would urge that detailed planning is undertaken urgently in this regard and clarification provided for schools on what this might look like, especially if it is to involve Centre Assessment Grades, given the challenges some schools are currently facing in relation to Freedom of Information requests and Subject Access requests. While it should only be in an absolute emergency that an alternative to examinations is instigated, we would argue that this planning should give careful consideration to developing a model where carefully and fairly moderated Centre Assessed Grades, in combination with examinations, could be implemented for 2021. Identifying this as a possibility now would help both CCEA and schools prepare for such a scenario.

We welcome the position that CCEA is currently reviewing the examination timetable for Summer 2021 to explore options to compress the timetable to provide schools with additional teaching time in the 2020/21 academic year. Reducing the number of examinations, as proposed at GCSE should facilitate this. ASCL Northern Ireland is willing to engage in further discussions on this.

We welcome the commitment that internally assessed tasks issued in the 2019/20 academic year can be carried across to 2020/21 in most subject areas.

### **C. Responses to specific questions**

***Question: To what extent do you agree or disagree with the proposals to implement public health adaptations to CCEA qualifications?***

Strongly agree.

Decisions need to be led by medical and scientific evidence in existence at the time

***Question: Do you have any comments on the proposed subject-specific amendments.***

There is a wide range of views emerging in schools led by ASCL members. We have encouraged individual schools, and their Heads of Department, to respond as appropriate.

ASCL is aware that Heads of Department have already been in contact with Subject Officers in CCEA before and during the summer break on assessment and delivery issues. It is important that

due consideration is given to these submissions and that they are included as part of this consultation process.

***Question: To what extent do you agree or disagree that CCEA should provide guidance on the order of unit delivery in a specification?***

Disagree.

Regrettably we contend that it is now too late for this strategy to be implemented. In acknowledging the uncertainty and changing nature of Covid-19, defining teaching order could have been of benefit, should there potentially have been temporary lockdown or other restrictions on delivering a full unit in a specification. There are now, however, some logistical problems, not least given that at this stage teaching is well underway and resources and materials have already been prepared to deliver these units in the classroom and remotely if necessary. In addition, for some schools this could be problematic where specification delivery is shared between teachers; this is more likely to be at AS and A level rather than for classes embarking on their first year of their GCSE course. We acknowledge that such an order definition could have facilitated schools in planning internal assessments allowing teachers across Northern Ireland to collect 'comparable' evidence over the year which might have been useful in the undesirable situation where examinations in 2021 could not happen.

An alternative to prescribing order of unit delivery would be to reflect further to allow for an element of optionality in the examination papers to be taken by students in summer 2021. While we acknowledge the issues raised by CCEA in the consultation paper around optionality, we would argue that at A level in particular, such a strategy would help alleviate some of the pressures on students and pupils during the course of this academic year.

***Question: Could you suggest any other information that CCEA could provide that may assist delivery planning?***

We want to stress the importance of the urgency of decisions being taken; With examination pupils having been in class since 24 August, significant time has been lost. Already it is too late to consider CCEA defining order of unit delivery in a specification, as has been outlined above. Schools need the information now.

***Question: To what extent do you agree or disagree with our proposal that in Summer 2021, students in the second year of their A level studies should be required to take A2 unit assessment only?***

Strongly agree.

Given the disruption to learning for Year 13 students, and the unusual classroom environments that will prevail during this academic year for Year 14 students, we support the decoupling of AS and A2 and accept that teaching and assessment for this year group should be as focused as possible on A2 units. We understand that grades only were awarded to AS level candidates in 2020 and as such there is no UMS which would be required if final A level outcomes were to reflect AS performance. Requiring students in their final year of Sixth Form to undertake examinations in all AS, as well as A2 modules, would place unreasonable stress on them; allowing, though not requiring, those who opt to take AS and A2 modules simultaneously is a satisfactory compromise. This cohort is facing significant pressure and many of our members

would argue that developing optionality for assessment of AS and A level students would be a significant and supportive step.

***Question: Other than public health adaptations (outlined in Appendix D), do you think course content should remain largely unchanged at AS and A level at this time?***

Broadly yes, bearing in mind that some essential foundation work for AS level will not have been covered since March in Year 12; similarly work crucial for A2 in some subject areas will not have been covered in Year 13. This will inevitably put pressure on teaching and learning time for AS and A level students. Some of our members have indicated that it would be unreasonable and unfair to expect teachers to compensate for the loss of significant teaching time in a subject that is skills-based and where pupils undoubtedly improve over the 2 years with much practice and reinforcement in the classroom. Some have raised concerns about pupils being unable to cope with A2 questions as they have missed the final few months of Year 13 where most of the exam practice and skill development occurs. Introducing optionality would reduce what needs to be covered by teachers without requiring uniformity and consensus across all schools on which content should be omitted.

There will be subject specific issues which centres will raise in this consultation which may need to be factored in to the 'temporary' assessment arrangements and content for 2021.

***Question: Do you have any additional comments on the proposed arrangements for CCEA AS and A level qualifications?***

The challenges schools will face during this academic year in delivering full specifications at AS and A level are already being manifest, with both staff and student Covid-19 related absences already happening. Schools are not and will not be 'normal' places this year. As stated above, it has to be borne in mind that some essential foundation work for AS level will not have been covered since March in Year 12; similarly work crucial for A2 in some subject areas will not have been covered in Year 13. This will inevitably put pressure on teaching and learning time for AS and A level students. While we would encourage breadth and balance, in these exceptional circumstances introducing optionality would reduce what needs to be covered by teachers facing time pressures without requiring uniformity and consensus across all schools on which content should be omitted. This approach would reduce significantly the pressure on students and teachers. In addition, this would allow a greater focus on skills development at A2 level, compensating to some degree for the huge loss in skills development during AS, as a result of lockdown.

***Question: To what extent do you agree or disagree that all 2020/21 Year 12 students who started their course in September 2019 should, where possible, be permitted to omit assessment in one unit in each GCSE qualification to be completed by Summer 2021, if they wish to do so?***

Strongly agree

This proposal treats all candidates, linear and modular, equally; this proposal removes the inevitability of linear students being disadvantaged, as they would otherwise have had to complete a significantly greater number of assessments in Summer 2021. The option for students, or

centres to opt into a full suite of assessments is appropriate, though some schools fear facing a legal challenge if they have not prepared their students for all aspects of the specification

Reducing the overall assessment load on students demonstrates a pastoral focus for students.

Some of our members have expressed concern that a change in direction for modular mathematics students, from that originally proposed, will have an extremely detrimental and dangerous impact on student health and well-being.

There is variation across subject areas in the proposals and this is creating inequalities, and careful consideration needs to be given to those subject areas where adjustments have not been proposed.

Subject specific issues will, no doubt, be raised as part of this consultation and these should be factored into a final decision.

***Question: To what extent do you agree or disagree with the proposed approach that, where omission of a unit is possible, CCEA should specify the GCSE units to be taken, with the intention of ensuring consistency, as far as possible, for schools and colleges?***

Agree

While some centres may perceive unfairness here, claiming that the unassessed work was already completed in Year 11, and others will argue that the unit to be assessed still has to be covered, both categories will have one less assessment to prepare for. We accept that allowing centres to select the module to 'drop' would result in inconsistencies across the system, with, in some cases, candidates being awarded grades on only 40% of the total subject weighting. Just because a unit is not assessed does not equate with the unit not being covered to ensure appropriate breadth and depth.

The alternative to this, to reduce the burden on students in 2021 examinations, but to a lesser extent, would be to provide examinations in all modules, with optionality in choice of questions. We have already acknowledged the problems that changing the format of the examination papers could have for students at this level and believe that a reduction in the number of examinations to be taken, where possible, is preferable for assessment at GCSE level.

There will undoubtedly be some specific subject based issues identified by centres and where these are identified, CCEA should give due consideration to these.

***Question: Do you have any comments on CCEA specifying required examination units for GCSE specifications?***

Originally, in June, ASCL Northern Ireland contended that areas which could be considered, showing pastoral concern for the young people affected, include changes to the regulations around the supervision of coursework and controlled assessment preparation, and a reduction in the content of specifications and changes to the assessment (for example providing questions which are optional...select either question A, B or C etc)

We accept that the recommendation to drop a unit in most subjects is preferable to selecting elements within each module to be omitted. There are, however, some subject specific concerns which will, no doubt, be raised by centres and we would ask that CCEA reflects on these. We note

and appreciate the argument in the consultation paper about the challenges of introducing, for one-year, optional questions in examination papers, but urge that this is given serious and immediate consideration again in those subject areas where the proposal is currently not to drop a unit for assessment.

We welcome the commitment that internally assessed tasks issued in the 2019/20 academic year can be carried across to 2020/21 in most subject areas but would point out that a significant amount of time can be spent on supervision of controlled assessment. There may be opportunities to rebalance this within subject specifications and would ask that this be considered.

***Question: To what extent do you agree or disagree that the total amount of any qualification adjustment in 2020/21 should not exceed 40% of the specification?***

Strongly agree

Subject to there being limited further disruption to learning during this academic year, we accept that reducing specification content by more than 40% could compromise the integrity of the assessment, bringing courses more in line with 'short course' specifications, already available in some subject areas. Where no adjustment has been made, we argue that this needs to be reviewed, especially in the light of subject specific feedback from centres to avoid inequalities between subjects. Again, we would stress that the focus has to be primarily on the students and not the system.

***Question: Do you have any comments on the arrangements for limiting the amount of change to 40% of the total assessment?***

We broadly support this decision, in an effort to continue to provide challenge for students as well as differentiation by outcome in assessment. Where no adjustment has been made in particular subject areas, we argue that this needs to be reviewed, especially in the light of subject specific feedback from centres to avoid inequalities between subjects and the consequent negative impact on students.

***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?***

The possible disadvantages for some students of optionality which have been outlined in the consultation paper is noted. We contend that, while optionality at GCSE level could be problematic for some students and reducing modules for assessment is preferable, we would argue that, with no content revisions being made to AS and A level specifications, introducing more optional questions in the 2021 AS and A level examinations would help alleviate some of the pressures on students and their teachers.

Overall, there are significant merits in allowing options to be selected, and this, as a strategy in examination design, especially at AS and A level, is supported by many of our members.

***Question: Do you have any additional comments regarding GCSE arrangements considered in this section?***

Consideration needs to be given to potential inequalities between subjects in assessment arrangements. We welcome the commitment to providing staged assessment opportunities in some subject areas in January 2021 as well as June 2021; this should allow some opportunity to spread the assessment burden for students, and teachers, in these subjects. Consideration should be given to how this arrangement could be extended to other subjects, though we acknowledge the impact on teaching time that any additional assessment windows would create.

***Question: Do you think that students should be assessed in all elements of GCSE English Language and Mathematics?***

Agree

***Question: Do you have any additional comments regarding students being fully assessed on all elements of these qualifications?***

In these two core subjects, students are entitled to breadth and balance of content.

We welcome the commitment to providing staged assessment opportunities in January 2021 as well as June 2021; this should allow some opportunity to spread the assessment burden for students, and teachers, in these subjects

Some of our members would argue that requiring all assessments to be undertaken will place an undue burden on students from deprived and disadvantaged backgrounds, who during March-June 2020, often through no fault of their own, were unable to access online home learning opportunities and who may end up 'competing' with students who have been able to access private tutors to support them for their final examination preparation.

In addition, some of our members are concerned that the 'goalposts' for modular candidates have changed from those earlier proposed which would not have required them to undertake all assessments.

***Question: Please outline any potential equality impacts which you feel we should consider.***

We are pleased that the issue of potential unfairness facing linear candidates has been addressed.

The impact on GCSE students taking courses where there has not been any proposed adjustment to assessment needs to be carefully reviewed.

At GCSE not all schools teach modules in the same order, or classes may have two teachers resulting in modules being taught concurrently. As a result, some of our members contend that some schools will benefit more than others from these proposals.

Some would argue that proposals for mathematics in particular will place an undue burden on students from deprived and disadvantaged backgrounds, who during March-June 2020, often through no fault of their own were unable to access online home learning opportunities and who

may end up 'competing' with students who have been able to access private tutors to support them for their final examination preparation.

***Question: Do you have any other comments you would like to make regarding the consultation proposals or other potential changes to qualifications?***

Individual centres will have responded with subject specific issues both as part of this consultation and directly in communication with Subject Officers; these need to be given due consideration.

With term already underway, we would again urge for speed in coming to the final decision. The well-being of our students, and their teachers who will play such a crucial role, must be paramount.

Prepared in discussion with ASCL Northern Ireland Executive members, and drawing on views expressed by ASCL NI members.



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