

Ofqual consultation: “Exceptional arrangements for exam grading and assessment in 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

We welcome the level of engagement Ofqual has had with ASCL and other stakeholders and acknowledge the great speed at which the regulator and other organisations have worked to bring this process to schools and colleges.

Broadly we agree with the approach taken by Ofqual in this consultation as the best available option under such difficult circumstances.

We notice that there seems to be an interchangeable use of ‘calculated grades’ and ‘centre-assessed grades’ in this consultation. We believe it is incorrect to describe the process as one of calculation (although we understand this may prove to be a method with other types of qualifications). We believe the term ‘calculated grade’ should not be used as it potentially devalues the extraordinary contribution being made by teachers in centres.

C. With regard to your specific questions

Centre assessment grades (CAGs)

1. QUESTION – to what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We agree with the process outlined overall. In guidance issued to our members we have emphasised the point that this is an exercise intended to replicate the grades students would have achieved if they had actually taken their exams.

We believe additional messaging is needed so that centres approach this exercise correctly for French and German, bearing in mind Ofqual's commitment to align standards with Spanish. Some centres may believe they should adjust their own grading rather than allowing awarding organisations to apply the correction. We recommend that this particular point is referenced in the Head of Centre declaration.

The Head of Centre's declaration

2. QUESTION – to what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We agree that teachers are well placed to carry out this exercise, supported and challenged by their leaders, so that the grade and rank distributions are as plausible as possible. Our view is that all language around this process should refer to 'centre' rather than 'teacher' and it is therefore entirely appropriate to require the Head of Centre to confirm ranks and grades as indicated.

We have given advice to members where the Head of Centre (or any teacher for that matter) may be connected to a candidate receiving a CAG. Ofqual should ensure that Awarding Organisations have processes in place to protect individuals and the integrity of the assessments.

3. QUESTION – to what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We do not believe an additional declaration is necessary. This is a difficult issue, given that teachers are required to emulate a process which does lead to differences between groups. For example, girls perform considerably better than boys in English Language GCSE. We have emphasised to ASCL members that, whilst perpetuating existing gaps is deeply uncomfortable, this is neither the method or moment to attempt to narrow them, and they should focus on the task of assigning the most plausible grade.

Which students?

4. QUESTION – to what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

ASCL welcomes the change of view regarding the inclusion of pupils in Year 10 and below in the CAG process. Even though the number of entries from candidates below Year 11 is now a small proportion of the total, many of our members took pains to point out that these were integral to their own curriculum models and that transition internally would be severely affected if no award was available.

We welcome the decision that grades awarded via this process will not be included in any form of accountability. It is therefore empowering for schools to be able to act in the best interests of their pupils without this additional concern.

Whilst we support this, we are concerned that there is a risk that the awarding process becomes less secure. We would suggest Ofqual works with the awarding organisations to ensure this is not the case. We assume not, given that there are entries from younger candidates in normal series. However, it is worth noting that the current Year 10 pupils are the oldest pupils to have scaled scores rather than older style national curriculum assessments with levels.

We understand the concern raised in the consultation about potential unfairness to other students in Year 10, but we do not believe this detracts from the benefits achieved by including them in the process.

Confidentiality

5. QUESTION – to what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We agree completely that teachers and Heads of Centre must be free from external influence during the process and whilst the term 'malpractice' may seem heavy handed it conveys how serious the process is and offers a useful retort to parents who may press centres for information.

Notwithstanding the fact that centres are exempt until results are published, we have great concerns about the potential for a large number of data subject access requests following that date and for the impact on teachers and school leaders as a result. We

would continue to urge Ofqual to seek emergency exemption for this process from appropriate data legislation.

There is a risk that disclosing rank may allow confidential information relating to other pupils to be deduced.

6. QUESTION – do you have any comments about our proposals for centre assessment grades?

COMMENT: In Post-16, colleges are concerned about the requirement to provide a single centre ranking for all their candidate grades. Some colleges will have many hundreds of learners taking a qualification. Moderating student grades across a large group of staff and students and often across several campuses is not always practical. ASCL suggests that in these instances, it should be permitted to submit rankings by staff or by smaller groupings such as 100-150 students. This is more practical for large centres and would provide the degree of accuracy required.

Issuing results

7. QUESTION – to what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer in accordance with the approach we will finalise after this consultation and not by any other means?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

8. QUESTION – do you have any comments about our proposal for the issuing of results?

COMMENT: ASCL believes there would be merit in releasing results to centres earlier than normal, with a longer embargo period. This would enable centres to check whether the process worked and absorb any implications of grades amended through moderation.

Impact on students

The impact of our proposals for results in summer 2020 on private candidates

9. QUESTION – to what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We have advised ASCL members to exercise great caution with respect to private candidates. We believe it will be very rare for a Head of Centre to be able to confirm that CAGs supplied for private candidates are sound.

We have requested that a category along the lines of 'insufficient evidence to assess a grade' be introduced to help centres treat this correctly.

We believe that some private candidates will be able to defer their entries until a later date without disadvantage, including the autumn series.

Students taking the qualifications elsewhere in the UK

10. QUESTION – to what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We believe that these arrangements should extend to students within the UK, so long as processes are in place to ensure as consistent an approach as possible across jurisdictions.

Students taking the qualifications outside the UK

11. QUESTION – to what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We believe it would be discriminatory to exclude pupils outside the UK from being included in the process, even though there may be a slightly increased risk of results being insecure. This is a natural corollary to current practice.

12. QUESTION – do you have any comments about the impact of our proposals on any particular groups of students?

Statistical standardisation of centre assessment grades

Statistical standardisation

13. QUESTION – to what extent do you agree or disagree with the aims outlined above?

- **Strongly agree**
- Agree
- Neither agree nor disagree

- Disagree
- Strongly disagree

COMMENT

We support the approach being proposed and the aims as suggested, although aim (iv) needs to be qualified with respect to extant differences between different groups of pupils, for example by gender in English Language.

The approach to standardisation

14. QUESTION - to what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

In guidance to members ASCL has made very clear that a statistical approach must form a significant part of the process and suggested how published data by DfE can be used to get some indication of the likely distribution of grades. We believe that the ranking process combined with a form of moderation will lead to a process which is fairest for pupils in both the current Years 11 and 13 and those cohorts immediately before and after.

We expect there to be an upward pressure on grades. Even where centres are exercising careful controls based on national distributions, there are understandable drivers amongst teachers, including decisions informed by target grades or by giving the benefit of the doubt.

There does not seem to be a process suggested in the consultation which would check how centres have approached this process across subjects. We believe this could be a useful additional aspect of moderation and would detect distributions which were within tolerance but have systematic lenience. We have advised Heads of Centre that this is a useful process to check individual candidates.

Considering centre trajectory

15. QUESTION - to what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process?

- Strongly agree
- **Agree**
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENTS:

We accept the point that there is no statistical approach which reliably anticipates continued trend, and that if this was done for those with an upward trajectory it may treat other schools unfairly.

Many ASCL members are exercised that the CAG process would not recognise potential rapid improvement. This is, unfortunately, one of the unfair aspects inherent in the proposed approach. Suspending performance tables and other forms of accountability

goes some way to addressing this concern. It is hard to envisage a workable process set alongside the statistical moderation process which could support centres in this situation.

Correcting for potential bias in centre assessment grades

16. QUESTION - to what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

Guidance produced by ASCL suggests an approach to support the ranking process by constructing an objective 'mark'. If schools follow this approach we believe that bias will be minimised. We believe that the rank produced by the school should remain inviolate, but that the Head of Centre declaration should include a statement that the centre has taken steps to alert teachers to the issue and checked results.

As discussed in other questions, the overarching ambition of this process is to recreate grades as if the exams had actually taken place. We believe Ofqual should make clear to centres that gaps between groups, based on the task being undertaken, are inevitable.

Incorporating the approach into the regulatory framework.

17. QUESTION – to what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?

- Strongly agree
- Agree
- **Neither agree nor disagree**
- Disagree
- Strongly disagree

COMMENT:

We believe awarding organisations are best placed to respond to this question.

18. QUESTION – do you have any comments about our proposals for the statistical standardisation of centre assessment grades?

COMMENT:

The area of greatest concern is for small groups at both GCSE and A level where we believe statistical predictions may fail. We have concerns about Modern Languages, based on continuing issues with native speakers, particularly at A level; it is difficult to see in this case how a standardisation model could work.

Independent school candidates, including those in centres outside of the UK, often do not have prior attainment at Key Stage 2 which could be used to model outcomes. We believe Ofqual should be explicit about how they aim to moderate independent schools' grades.

At Post-16 level and especially in FE Colleges, the 16- 18 GCSE English and maths cohort is not a fully relevant age cohort. It may include 14-16 in colleges as well as adults. It is not clear how any adjustment would apply in this case. This group is hard to predict as it can vary, including according to college entry policies. Colleges will want to ensure any changes are properly reflected in their assessment grades. Colleges were also predicting improvements in some subjects like maths as a result of interventions this year from the maths centres of excellence project and other major projects.

The equalities impact of such interventions should be recognised and corrected at a centre and national level.

Appealing the results

Professional judgements

19. QUESTION – to what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

Given that the centre itself has produced the grades, an appeals process challenging professional judgement would be redundant, and in any case, as the consultation document points out, there is no reference point in existence to carry out such an appeal.

20. QUESTION – to what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre's rank order?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

This would be impracticable and require an understanding of the performance of other pupils, which is wholly inappropriate.

Procedure – centres

21. QUESTION – to what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We do not believe there could be grounds for appeal given the autonomy afforded to centres to assess grades. An attempt to investigate the process used by schools risks undermining confidence in the entire process.

Procedure – exam boards

22. QUESTION – to what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We believe this is an important safeguard for centres.

23. QUESTION – to what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We would be greatly concerned at the prospect of an appeal from an individual potentially affecting the centre's rank and would therefore strongly support this proposal.

24. QUESTION – to what extent do you agree or disagree that we should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered?

- Strongly agree
- Agree
- **Neither agree nor disagree**
- Disagree
- Strongly disagree

COMMENT:

Awarding organisations will be best placed to assess the impact of this decision, but it is connected to the bigger issue of whether the entire rank order would be affected and hence, theoretically, many students having grades changed.

25. QUESTION – to what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We would accept, though, that there may be cases where the awarding organisation has made an error which is uncovered by the appeal of an individual.

26. QUESTION – to what extent do you agree or disagree that exam boards should be permitted to ask persons who were involved in the calculation of results to be involved in the evaluation of appeals in relation to those results?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We believe it is reasonable for the awarding organisation to seek clarification about the process and evidence used to determine the rank, and this would necessitate discussion with those involved in the process.

27. QUESTION – to what extent do you agree or disagree that exam boards should be able to run a simplified appeals process?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

Given the exceptional circumstances we believe awarding organisations need flexibility to deliver a process which is practicable.

The statistical standardisation process

28. QUESTION – to what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

Appeals based purely on the operation of the standardisation model would be highly problematic, casting doubt on grades across centres. However, there needs to be transparency about how the model operates and we would anticipate a report based on the output of the model so that centres can understand how it had operated.

Exam Procedures Review Service

29. QUESTION – to what extent do you agree or disagree with our proposal to make the EPRS available to centres for results issued this summer?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

We believe this is a helpful additional safeguard for the system.

An autumn exam series

30. QUESTION – to what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)?

- Strongly agree
- Agree
- **Neither agree nor disagree**
- Disagree
- Strongly disagree

COMMENT:

There are wider questions which need to be addressed about the autumn series which makes an answer to this difficult. It would depend on a wide range of issues, many of which seem problematic to us.

To which qualifications will the exceptional regulatory measures apply?

31. QUESTION – to what extent do you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualification?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT: We agree with this because of the use of these qualifications by students as part of offers from higher education institutions.

32. QUESTION – do you have any comments about the qualifications to which the exceptional regulatory measures will apply?

NO COMMENT

Building the arrangements into our regulatory framework - The regulatory background Preventing exams - GCSE and GCE qualifications

33. QUESTION – to what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and

June 2020?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

The Advanced Extension Award Qualification and Extended Project Qualifications

34. QUESTION – to what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer?

- **Strongly agree**
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree

COMMENT:

35. QUESTION – do you have any comments about our proposals for building our arrangements into our regulatory framework?

Equality Impact Assessment

This covers:

- Use of centre assessment grades
- Reliability of predicted GCSE, AS and A level grades
- Reliability of teacher assessment
- Students who cannot receive an assessed grade

36. QUESTION:

- a) Are there other potential equality impacts that we have not explored? If yes, what are they?
- b) We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated.

There is a major concern that disadvantaged students will be impacted further by the closure of schools and colleges. This will also have a major impact on providers themselves and despite the support by Government for all schools and colleges, they will need to be fully funded for all the measures they have had to take to ensure their students are impacted as little as possible and carry on learning.

Regulatory Impact Assessment

- Impact on exam boards
- Impact on centres
- Impact on students
- Impact on the FE and HE sectors and employers
- Innovation and growth

- Estimated costs and savings

37. QUESTIONS:

- a) **Are there additional activities associated with the delivery of the revised approach that we have not identified above? If yes, what are they?**

COMMENT:

- b) **What additional costs do you expect you will incur through implementing this approach?**

- c) **What costs will you save?**

ASCL members have expressed concerns about fees and believe there should be a mechanism to refund or apply credit because, in their view, the series will cost awarding organisations less to run. We believe this is probably the case, but there are already considerable costs to awarding organisations given the need to build new systems, and many costs have already been incurred in constructing the papers for the summer series.

Given that the status of the autumn series is not clear, it is debatable whether those papers could be used, or how many candidates they would attract.

ASCL believes Ofqual should require the awarding organisations to report on their costs and determine appropriate refund rates across the sector. We accept that this will not be clear for some time.

- d) **We would welcome your views on any suggestions for alternative approaches that could reduce burden.**

D. 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
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Association of School and College Leaders

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