

Department for Education and Ofqual consultation on contingency arrangements for GCSE, AS and A-levels 2021/2022

Response from the Association of School and College Leaders

A. Introduction

1. The Association of School and College Leaders (ASCL) represents over 21,500 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.
2. ASCL welcomes the opportunity to contribute to this consultation.

B. General points

3. ASCL welcomes the fact that the Department and Ofqual are proactively consulting on contingency plans in case exams next summer are cancelled, but believe that this consultation comes too late, which was avoidable. The consultation closes in mid-October, by which point many schools and colleges will have already undertaken mock exams or will have limited time to respond to the guidance when it is released.
4. While it was important to learn lessons from the 2021 TAGs process, these proposals could have been consulted on significantly earlier. This has created unnecessary and avoidable uncertainty and anxiety for young people preparing to take exams next summer.
5. ASCL broadly welcomes these proposals as proportionate measures to take, in case there is a need to cancel exams in summer 2022. The 2021 TAG system was largely successful in ensuring candidates achieved the grades they needed for progression. However, there were concerns around workload for centres, consistency and fairness across centres, and the external quality assurance that we would like to see improved. We set these out in more detail below.
6. We reject the language of Teacher Assessed Grades, and would prefer a term that implies less individual judgement, and recognises the wider role of the school or college and the exam boards in the process. We have continued to use this term in our consultation response, to avoid confusion, but would welcome a conversation about possible alternative terminology.
7. The consultation document is right to cite workload as a key area for improvement in a TAG model. Workload for schools and colleges can be reduced by clearer guidance on how many assessment pieces should be used to inform and evidence a TAG. It can also be

reduced by exam boards producing more, optional assessment items for schools and colleges to use. ASCL is disappointed that no new assessment material will be produced by exam boards.

8. As the proposals suggest asking schools and colleges to assess students over three touch-points, this will mean many teachers will have to write their own assessments as previous exam questions will have been used in the course of teaching and learning.

9. The consultation is also right to identify consistency between and within schools and colleges as an issue. The proposals go some way to increasing consistency, while being flexible enough to address issues of fairness and differential learning loss.

10. However, there is still significant risk of centres taking very different approaches to assessment, even if following the guidance. Following the response to this consultation, the exam boards must publish subject-level guidance on what evidence would be expected to inform a TAG should exams be cancelled next summer. This should include a consideration of 2021 appeals that were upheld on the grounds of the selection of evidence.

11. The consultation does not suggest what metrics would determine exams being cancelled. In January 2021, exams were cancelled as it was deemed unfair for them to go ahead, given the disruption to students. The 2022 exam cohorts are arguably even more affected than the previous two years. It would be useful to understand how decision making about whether it's fair and/or safe to run exams will be made.

12. It is unclear how other announcements on the summer 2022 series are reflected in contingency planning. For example, if giving grades (not TAGs) to students, how to interpret mark schemes against the grade profile. The guidance produced by JCQ on grading criteria in 2021 must be significantly improved to be meaningful. This must be produced regardless of whether exams are cancelled or not, as school and colleges are being asked to conduct and mark assessments.

13. Likewise, it is unclear whether schools or colleges should issue advanced information for their own assessments, using the approaches and principles set out in the JCQ guidance on advanced information. Furthermore, if the second and third internal assessments fall after 7 February, should schools and colleges limit their assessment to the content included in the national advanced information? Either way, clear guidance on this issue must be given, otherwise different centres will approach assessments differently.

14. ASCL members expressed concern that the external quality assurance process in 2021 did not quality assure the evidence from a majority of centres. We believe that this may have undermined the sector's confidence in the process. In the consultation on quality assurance and appeals, the DfE and Ofqual should consider whether publishing exam boards' risk criteria is helpful or unhelpful, fairer or less fair.

15. ASCL does not believe that exam boards took sufficient ownership over changes to grades following an upheld appeal in 2021. In many cases, centres were asked to regrade candidates themselves, having already been through the internal QA process, external QA process and stage one centre review appeal. If TAGs are used in 2022, the exam boards must award the grade they think is most accurate following a successful appeal to the exam board, under any grounds.

16. We are concerned about young peoples' mental health which may suffer from having up to four formal assessments over the year (if exams go ahead). Each of these assessments is high stakes as it may be used to inform a TAG if exams are cancelled. The Department

should monitor the impact on students' welfare that the contingency plans are having, and the government must ensure adequate funding for mental health support both within and outside of schools and colleges.

17. We broadly welcome these proposals, with some important caveats. Given the response to this consultation is unlikely to be published before the October half-term, schools and colleges must not be penalised if they are unable to implement all of the contingency proposals this term.

C. In response to your specific questions

How helpful do you think this guidance will be for teachers who will be making decisions on how to collect evidence to support TAGs as a contingency if exams are cancelled in 2022?

18. Helpful.

Are there any parts of the guidance which you think could be improved? Please be specific about which element of the guidance (a – m) you are referring to.

19. The timetable in element b, although guidance, will be confirmed too late to be meaningful in many centres. The final guidance should make clear that centres won't be penalised if they don't hold an assessment before Christmas, or have already held assessments that did not meet all the criteria set out in elements a-m. The guidance should also make clear that it is acceptable to hold the first of the three formal assessments early in the spring term.

20. Element e should be expanded to explain how individuals' absences within a centre should be accounted for in assessments. Guidance should include recommendations about personalising assessments for students who have not been taught content, or how to use special consideration in the marking of that assessment.

21. In element e, greater guidance should be given on how much content should be assessed at each assessment point. For example, assessing content taught between the spring and early summer assessment may mean a very narrow assessment. Should the same content be assessed over multiple mock exams?

To what extent do you agree or disagree that the guidance set out above would reduce pressure on students, compared to the arrangements for TAGs in 2021?

22. Agree

To what extent do you agree or disagree that the guidance set out above would reduce teacher workload, compared to the arrangements for TAGs in 2021?

23. Agree

Do you have any comments on the support exams boards should provide to teachers determining TAGs should they be needed in 2022? Please be specific about any additional support you think should be provided.

24. In some ways, there are additional pressures on students under these proposals as, if exams go ahead, they effectively have four high-stakes exam series over the coming year. However, this is unavoidable if we want a robust contingency plan, and the clarity of which assessments may inform a TAG is welcome, and should reduce anxiety.

25. ASCL is disappointed that the exam boards will not be producing new assessment material (other than the autumn series paper) for use within centres. A range of assessment items that are optional would, despite not having the richness of mark schemes available for past papers, substantially reduce teacher workload. This is a clear view expressed by ASCL members, and one we will continue to raise with the DfE, Ofqual, the boards and the public.

To what extent do you agree or disagree that if exams are cancelled exam boards should not be required to continue moderation of NEA?

26. Disagree.

Do you have any other comments about the evidence which should be used to assess students' performance?

27. As the expectation is for candidates to complete NEA, we cannot see why exam boards would not be expected to moderate NEA in the normal way. We would suggest that, if exams are cancelled, qualifications that are largely or solely NEA-assessed in 2022 (e.g. art and design) should be assessed in the normal way by exam boards.

28. Additional guidance should include the coverage of assessment objectives that is expected for each qualification, and how centres should approach TAGs for students who don't have a full coverage of objectives.

To what extent do you agree or disagree that if it proves necessary to cancel exams and implement TAGs in some parts of the country, exams should be cancelled for all students and the TAGs approach should be implemented nationally?

29. Strongly agree.

Do you have any other comments about the proposal for a national approach?

30. ASCL strongly supports a national approach in England. The DfE and Ofqual must also consider whether exams are happening in Northern Ireland, Scotland and Wales. It would be helpful if DfE were transparent in their response to this consultation as to what metrics will be used in policy-making decisions about potentially cancelling exams.

Do you have any comments on how arrangements from 2021 could be improved in order to better provide access to TAGs for private candidates?

31. The proposals are sufficient. No centre should be obliged to take on any type of private candidate. The DfE should issue a list of centres willing to take on unknown private candidates, as it did last year.

To what extent do you agree or disagree that schools and colleges should only be required to develop centre policies for determining TAGs if exams are cancelled in summer 2022?

32. Agree.

Do you have any comments on how schools and colleges should quality assure TAGs in 2022 (should they be needed)?

33. Centre quality assurance was highly effective in 2021, with very small numbers of centres being asked to change their centre policy, despite the fact that all centre policies were externally quality assured.

34. If exams are cancelled in 2022, the exam boards must confirm the date by which centre policies will be approved, and time must be allowed for all centre policies to be meaningfully reviewed. This creates confidence in the system, and protects schools and colleges in the appeals process. If centres have not been contacted by this date, they must be able to infer that their centre policy is approved.

Do you have any comments on how the exam boards should quality assure TAGs in 2022 (should they be needed)?

35. In 2021, all centres were asked to submit a sample of evidence for at least two qualifications. However, only a minority of centres' evidence was reviewed by exam boards. It is impractical to moderate every candidate's evidence, but it should be possible to moderate a sample of every centre's evidence, as currently happens with NEA. The cost of this should be covered by exam boards, and not passed on to schools and colleges in fee increases.

36. During the quality assurance process, if exam boards don't agree with the grades being awarded, they should report which grade they think should be awarded. It does not make sense to ask centres to regrade a candidate when they have already been through internal quality assurance.

Do you have any other comments about how TAGs should be quality assured in 2022 (should they be needed)?

37. The workload required to submit samples of work in 2021 was not proportionate to the amount of sampled work that was actually reviewed by the exam boards. If the 2022 contingency arrangements do not include moderation of all centres' samples, then a more proportionate approach is needed. If the reason for requiring all centres to send in samples is behavioural, then this should be transparent.

To what extent do you agree or disagree that students should be able to appeal if TAGs are used in 2022?

38. Agree.

To what extent do you agree or disagree that the grounds for appeal should cover: a) administrative and procedural errors b) errors of academic judgement in determining the evidence used to determine a TAG?

39. Agree.

To what extent do you agree or disagree that the grounds for appeal should cover: a) administrative and procedural errors b) errors of academic judgement in the determination of the TAG itself?

40. Agree.

To what extent do you agree or disagree that appeals should first be considered by the student's school or college which would check for any administrative or procedural errors?

41. Neither agree nor disagree. To answer this question, we would need to know what percentage of stage one appeals were successful in 2021. If the percentage is low, then this would suggest it is an unnecessary administrative burden on schools and colleges.

To what extent do you agree or disagree that if a student remained concerned after an appeal to their school or college, the school or college would submit an appeal to the exam board on the student's behalf?

42. Agree.

To what extent do you agree or disagree that a student's result could go down as well as up following an appeal?

43. Strongly agree.

To what extent do you agree or disagree that a student who had completed the appeal process could apply to Ofqual's Examination Procedural Review Service which would check that the exam board had followed the correct procedure when issuing the grade and considering an appeal?

44. Agree.

Do you have any other comments about appeal arrangements if TAGs are used in 2022?

45. Where an appeal is upheld by the exam board, whatever the grounds for appeal, the exam board must issue a revised grade (whether higher, lower or the same), rather than asking the centre to regrade the candidate. By this point in the appeals process the exam boards have as much information as the centre on the candidate, including their evidence, any requests for access arrangements and special consideration, and how these were implemented. The exam boards remain the certificating bodies for qualifications and, following an upheld appeal, must award the grade they think is most accurate.

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

46. Similar trends to the 2021 results may continue.

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

47. Similar trends to the 2021 results may continue. The disadvantage gap has grown between 2019 and 2021, but it is not clear whether this a result of the CAGs/TAGs process or reflects the relative impact of the pandemic on students' learning.

Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above?

48. The contingency plans are proportionate and needed. However, this will increase workload in schools, whether exams are cancelled or not. The government should fund the cost of this additional work.

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

49. The largest cost increase for schools and colleges is likely to be staff time, and the purchasing of any additional assessment items from third parties. These costs will be incurred regardless of whether exams go ahead or not.

What costs would you save?

50. As the stated intention is for the summer 2022 exam series to run, and that these proposals should be implemented regardless, in case exams are cancelled, up until the early summer term, there are unlikely to be any cost savings for schools and colleges.

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

51. It would be far more economical to fund the exam boards to produce new, optional assessment materials for use in the three suggested formal assessments over the year, than requiring centres to produce their own assessments themselves or from past papers.

D. Conclusion

52. We are pleased that the DfE and Ofqual are proactively consulting on contingency arrangements in case exams are cancelled.

53. However, this consultation already comes too late in the academic year. We would urge an expedient, prompt response. The response, and subsequent guidance arising from it, should be clear and coherent, and provide schools and colleges with the information they need to implement the proposals this term.

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

*Tom Middlehurst
Curriculum, Assessment and Inspection Specialist
Association of School and College Leaders
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