

## Ofqual consultation on arrangements for an autumn 2021 exam series

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

*April 2021*

#### **A. Introduction**

The Association of School and College Leaders (ASCL) represents over 21,000 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 and further education and skills phases. 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.

#### **B. General comments**

ASCL does **not** support the arrangements for an autumn series. We appreciate the decision is a political one, but we strongly urge Ofqual to recommend not running a full series for general qualifications in the autumn term 2021.

The decision to run a full autumn series in 2020 was understandable: the CAG process in summer 2020 made it permissible for centres to submit CAGs based on evidence from before the lockdown, with no requirement to undertake further assessment in the summer term. There were limited grounds for candidates to appeal their CAG in August 2020, and so an autumn series provided an opportunity for natural justice.

In 2021, Ofqual requires centres to inform students what evidence will be used to reach a holistic TAG, before the submission of grades by 18 June. The appeals process also allows students to put forward an appeal if they think either their centre's grading or their centre's selection of evidence does not demonstrate a reasonable exercise of academic judgement. The 2021 grading process is therefore fundamentally different from the 2020 grading process. Candidates have agency over their results, and the option to appeal their final grades.

In Ofqual's published Guidance for Centres, they state that getting a certain grade this summer should be no easier nor harder than in previous exam years. The decision to run an autumn series undermines this principle, and would suggest to the public that results gained through the DfE / Ofqual designed process this summer are not comparable to

previous and future years. If DfE and Ofqual want the process this summer to carry public confidence, then they must reject an autumn series.

Furthermore, the Government's decision to cancel exams in January 2021 was on the basis that there had been too much disruption to candidates' education; not on public health concerns about the practicalities of holding exams in May and June. The impact of differential lost learning will not be mitigated by an autumn series. Conversely, as schools and colleges will have limited time to support students wishing to enter autumn exams, then an autumn series is likely to privilege candidates able to afford additional support or private tuition. An autumn series is likely to increase the disadvantage gap further.

An autumn series is likely to be costly to the system. The consultation does not cover how these costs would be met. It would not be acceptable for the costs of an autumn series to be covered by the summer 2021 exam fees and result in less rebate for centres.

We appreciate there will be some candidates, particularly private candidates, who would prefer to sit exams in the autumn. However, DfE have made clear that all private candidates can receive a TAG this summer.

Every year there are students who remain unhappy with their exam grades, and the outcome of an appeal. Usually these students would have to wait until the following summer to resit exams. Students unhappy following an appeal this summer, will also have the option to sit exams in summer 2022, as normal.

If a political decision is made to run an exam series this autumn, then we strongly suggest limiting the series to qualifications that had the highest uptakes in the autumn 2020 series, in order to reduce the cost and burden on the system.

We strongly reject an autumn series for general qualifications, other than the established autumn GCSE resits in English and maths. It is not in the interests of most learners' education, is a distraction from teaching the curriculum in the autumn, and is likely to be very costly for very little gain.

We have answered the consultation questions after Q4 assuming that an autumn series does go ahead, but each answer should be read with that caveat that we do not support an autumn series.

### **C. In response to your specific questions**

1. To what extent do you agree or disagree that students who receive a teacher assessed grade in summer 2021 should be eligible to enter for the corresponding GCSE, AS and A-level exam in autumn 2021:

#### **Strongly disagree**

2. To what extent do you agree or disagree that exam boards should be able to accept entries for the autumn exams from students who did not enter to receive a grade in summer 2021 but who, in the opinion of the exam board, would have entered for the summer 2021 exams had they taken place?

**Strongly disagree [the DfE and Ofqual have made clear that all candidates, including private candidates, who planned to take exams this summer can receive a grade]**

3. To what extent do you agree or disagree that the autumn 2021 exams should be open to all students, regardless of any actual or planned intended entry in summer 2021?

**Strongly disagree**

4. Do you have any comments on which students should be able to take exams in autumn 2021?

**Please see general comments above**

5. To what extent do you agree or disagree that students entering GCSE, AS or A levels in autumn 2021 should be assessed on their performance in exams only?

**[If a series goes ahead] agree**

6. Do you have any comments in our proposal that, with the exception of art and design qualifications, grades should be determined by students' performance in exams only?

**Other subjects with a considerable percentage of NEA based on performance should be included [If a series goes ahead]**

7. To what extent do you agree or disagree that students entering GCSE, AS or A level art and design should be assessed on their performance in an exam board set task only?

**[If a series goes ahead] agree**

8. To what extent do you agree or disagree that students' work in response to the art and design tasks should be marked by the exam boards?

**[If a series goes ahead] strongly agree**

9. Do you have any comments on our proposed approach to art and design qualifications?

**NA**

10. To what extent do you agree or disagree that students should be able to carry forward any grade for practical science and geology skills to the autumn 2021 series?

**[If a series goes ahead] agree**

11. Do you have any comments on our proposed approach to the separately reported grades for A level practical science and geology skills?

**NA**

12. To what extent do you agree or disagree that students should be able to carry forward any grade for spoken language in

**[If a series goes ahead] agree**

13. Do you have any comments on our proposed approach to the separately reported grades and for GCSE English language and modern foreign language spoken language skills?

**NA**

14. To what extent do you agree or disagree that the autumn exam papers should be in their normal form, in terms of:

- the number of exams per subject:  
**[If a series goes ahead] strongly agree**

- style of the questions:  
**[If a series goes ahead] strongly agree**

- the format of the papers:  
**[If a series goes ahead] strongly agree**

- conditions under which they  
**[If a series goes ahead] strongly agree**

15. To what extent do you agree or disagree that students should not be given advance information about topics that will be included in the autumn exams?

**Agree [until a political decision is reached about the design of the summer 2022 exams it would be wrong to change the format of any exam series in the autumn]**

16. To what extent do you agree or disagree that students taking autumn exams should only have access to the usual support materials when taking an exam?

**Strongly agree**

17. Do you have any comments on our proposals about the form of the autumn 2021 exams?

**We do not support autumn 2021 exams. If the series goes ahead, the form of the exams must be the same as in previous exam years, especially before a decision on the summer 2022 series has been made and published.**

18. To what extent do you agree or disagree that:

- AS and A level exams should be held in October 2021 (with entries being required by early September):

**Neither agree nor disagree**

- To what extent do you agree or disagree that - GCSE exams should be held in November and early December 2021 (with entries being required by early October):

**Neither agree nor disagree**

- To what extent do you agree or disagree that - GCSE English language and maths exams should be held later than usual?

**Agree**

19. Do you have any comments on our proposals for when exams should take place?

**NA**

20. To what extent do you agree or disagree that the usual arrangements for reviews of marking and appeals should apply to the autumn 2021 exam series?

**[If a series goes ahead] agree**

21. Do you have any comments on our proposal that the usual provisions for reviews of marking and appeals should apply in autumn 2021?

**NA**

22. To what extent do you agree or disagree that an exam board must, at the request of a student, reissue a certificate to show the better of the grades issued to a student in summer 2021 and autumn 2021?

**[If a series goes ahead] agree.**

23. To what extent do you agree or disagree that an exam board should not reissue a certificate to show the better of the grades issued in summer 2020 and autumn 2021?

**[If a series goes ahead] agree**

24. Should we require or permit the exam boards to offer GCSE exams in autumn 2021?

**[If a series goes ahead] require.**

25. Should we require or permit the exam boards to offer AS exams in autumn 2021 or should we prohibit them from offering AS exams?

**[If a series goes ahead] require**

26. Should we require or permit the exam boards to offer A level exams in autumn 2021?

**[If a series goes ahead] require.**

27. To what extent do you agree or disagree that, if we require exams boards to offer exams, we should lift this requirement for any subject for which there have been no entries by the entry deadline?

**Strongly agree**

28. Do you have comments on whether we should require or permit the exam boards to provide GCSE and A level exams in autumn 2021?

**NA**

29. Do you have comments on whether we should require or permit exam boards to provide AS exams in autumn 2021 or whether we should prohibit them from doing so?

**NA**

30. To what extent do you agree or disagree that we should not require the exam board to offer AEA exams in autumn 2021?

**Agree**

31. To what extent do you agree or disagree that we should not introduce any rules about the submission of project qualifications in autumn 2021?

**Agree**

32. Do you have comments on our proposed approach to AEA and Project qualifications in autumn 2021?

**NA**

33. Are there any other aspects of the possible arrangements for the autumn exams that could have a possible negative impact on students because of their protected characteristics that we have not identified?

**Yes, because schools and colleges will have limited to capacity to prepare students for an autumn series, an autumn series disadvantages candidates who are unable to pay for private support or tuition.**

34. How could any negative impacts be removed or mitigated?

**We do not support an autumn series for general qualifications.**

35. We have set out our understanding of the impact of our proposals on schools, colleges and exam boards. Are there any other potential impacts that we have not identified?

**NA**

36. Are there any additional steps we could take to reduce the costs or burdens of our proposals?

**If an autumn series goes ahead, this must be funded by government, and not by summer 2021 exam fees, or by individual centres or candidates.**

## **D. Conclusion**

ASCL has responded to the separate consultation on VTQ exams in the autumn, which we feel is different due to the diverse nature of VTQ assessment, and the existence of a September – January assessment window for many VTQs already in place.

We are grateful for the opportunity to respond to this consultation, and hope our response is of value to the process.

*Tom Middlehurst  
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The Association of School and College Leaders  
8 April 2021*