

**The Mathematical Association response to the joint Ofqual/Department for Education consultation 'Contingency arrangements: GCSE, AS, A level, Project and AEA' 12<sup>th</sup> October 2021**

**Question 1**

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?

Somewhat helpful.

Teachers will find the development of a contingency plan reassuring because the situation in schools remains volatile. These proposals are clearer and more timely than the guidance of last year and it is pleasing to see safeguards introduced to discourage excessive testing.

**Question 2**

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.

“f) Centres may wish to aim for a total assessment time that does not significantly exceed the total exam time for the specification.” Consistency between Centres might be improved by setting a ceiling such as 50% more than the total exam time for the specification.

“g) Students should be told before they take the assessment that their performance in the assessment would be used to inform their TAG if exams were cancelled to ensure they have time to prepare. They should be told the aspects of the content the assessment will cover, but not the specific questions.” A minimum notice period should be specified and examples given of the level of detail that should be provided.

**Question 3**

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?

Disagree.

Students have become accustomed to managing a relatively short period of intense pressure during their terminal exams. In 2021, the majority of assessment used to inform the TAGs still took place towards the end of their courses. Under these proposals, students will face potentially life-changing assessment in all three terms and we have concerns about the negative impact this extended period of pressure may have on their enjoyment of their studies and their mental health.

**Question 4**

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?

Disagree.

The workload associated with collecting evidence for TAGs under these proposals will be broadly similar to last year but teachers are likely to also be required to prepare students to sit terminal exams so the overall workload is likely to increase.

#### **Question 5**

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.

Our members have informed us they would like the Awarding Organisations to release new secure assessment materials to support this contingency plan but we realise this is probably an unrealistic expectation at such short notice.

#### **Question 6**

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

Neither agree nor disagree.

Not relevant to mathematics.

#### **Question 7**

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

No.

#### **Question 8**

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?

Strongly agree.

#### **Question 9**

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

We strongly agree that exams should be cancelled for all if it becomes necessary to implement TAGs in some parts of the country. A mixed approach would favour those students assessed by TAGs as it is indisputable that this approach leads to grade inflation.

#### **Question 10**

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

Private candidates can find it difficult and frustrating to find a Centre to accept them. It would be useful for JCQ to continue to maintain their searchable list of Centres that accommodate private candidates and promote its availability.

#### **Question 11**

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?

Strongly agree.

Reducing unnecessary workload must be a key priority so Centres should not be required to develop TAG policies unless a decision is made to cancel the exams.

#### **Question 12**

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

A greater emphasis needs to be placed on the requirement for schools and colleges to compare TAGs to their pre-Covid performance in each subject so that the grade inflation from 2020 and 2021 does not become 'baked-in'.

#### **Question 13**

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

In the event of exams being cancelled, it is important that measures are introduced to avoid a third consecutive year of grade inflation. The Awarding Organisations may need to do more to challenge Centres that submit high TAGs that cannot be justified.

#### **Question 14**

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

No.

#### **Question 15**

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

Agree.

#### **Question 16**

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?

Disagree.

#### **Question 17**

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?

Disagree.

#### **Question 18**

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?

Agree.

#### **Question 19**

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?

Disagree.

#### **Question 20**

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

Strongly agree.

#### **Question 21**

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?

Disagree.

#### **Question 22**

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

Students and parents/carers will expect an appeals process to exist but we firmly believe the grounds for appeals should be strictly limited. A sufficient mechanism would be a Centre Review for administrative and procedural errors. Teachers are more qualified than students to determine

which evidence should inform a TAG and we do not believe it is necessary or desirable to allow appeals to the Awarding Organisations against matters of professional academic judgement.

Handling appeals is an onerous burden for schools/colleges but they are better placed than the Awarding Organisations to establish whether administrative or procedural errors have occurred. We believe that Awarding Organisations should only become involved if there is an unresolved allegation of professional malpractice.

It is essential that results can decrease as well as increase following appeals. The number of appeals would be completely unmanageable if results could only stay the same or go up.

A third appeals tier seems excessive and will not be necessary if the role of Awarding Organisations is restricted to investigating allegations of malpractice.

### **Question 23**

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

No.

### **Question 24**

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

Not applicable.

### **Question 25**

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

No.

### **Question 26**

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.

Not applicable.

### **Question 27**

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?

No.

### **Question 28**

What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting? Please distinguish in your response between those costs you expect to incur from preparing to put contingency arrangements in place, and those that would be incurred if the arrangements were required.

The costs associated with preparing to put the contingency arrangements in place will include the time school and college leaders will need to develop a coherent delivery plan and for teachers to select, amend and copy suitable resources and then adjust schemes of work and assessment plans. In addition, there will be costs associated with invigilation and the provision of access arrangements as well as the time required for teachers to mark assessments and provide feedback. Finally, if exams are cancelled, there will be costs involved in using the accumulated evidence to determine, moderate and quality assure TAGs and conduct any subsequent appeals.

### **Question 29**

What costs would you save? Please distinguish in your response between those costs you expect to incur from preparing to put contingency arrangements in place, and those that would be incurred if the arrangements were required.

It is likely that the Awarding Organisations will again offer a partial fee refund if exams are cancelled.

### **Question 30**

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

No response.