Consultation on grading specified general qualifications in 2020: GCSEs, AS, A levels, Extended Project Qualifications and Advanced Extension Award.

This consultation ran from 4:45pm on 15 April 2020 to 11:45pm on 29 April 2020

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Do you wish any part of your response to remain confidential? *

No

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

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

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?

Neither agree nor disagree

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?

Agree

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

Do you have any comments about our proposals for centre assessment grades?

We feel teachers in post-16 centres, and especially teachers of those re-sitting will find it very difficult to manage the ranking of possibly hundreds of students. Many of these students will be in just one grade boundary (grade 3 to 4) and it will very difficult to rank the students accurately across multiple classes and teachers.

Issuing results

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

Do you have any comments about our proposal for the issuing of results?

n/a

Impact on students

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?

Neither agree nor disagree

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?

Agree

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?

Agree

Do you have any comments about the impact of our proposals on any particular groups of students?

We feel that depriving private students of grades will be detrimental to these students in the long term. A proportion of private students left main stream education due to issues at school (inadequate SEND provision, mental health issues, bullying and other pastoral problems).

- 1. We need to be supportive of the teachers entering private students via centres.
- 2. We agree that teachers should only provide confidential information to exam boards to prevent the possibility that some parents may apply pressure to education professionals to inflate grades.
- 3. The appeals procedure needs to be open to all, accessible, transparent and capable of delivering a verdict on the appeal before September 1st so that students going on into the 6th form, FE, university know where they stand before their term starts
- 4. There is evidence of centres refusing to enter private candidates into this process. One can understand why, as a school they will not have the kind of evidence that they judge to be necessary to assess the grade of a private candidate, but this is grossly unfair on the private candidate. Centres should be told that they must enter private candidates into the process, record them as private candidates and log the predicted grade.

Statistical standardisation of centre assessment grades

The proposed aims of the standardisation process are as follows:

- 1. to provide students with the grades that they would most likely have achieved had they been able to complete their assessments in summer 2020
- 2. to apply a common standardisation approach, within and across subjects, for as many students as possible
- 3. to use a method that is transparent and easy to explain, wherever possible, to encourage engagement and build confidence

- 4. to protect, so far as is possible, all students from being systematically advantaged or disadvantaged, notwithstanding their socio-economic background or whether they have a protected characteristic
- 5. to be deliverable by exam boards in a consistent and timely way that they can quality assure and can be overseen effectively by Ofqual

We will seek to meet these aims while maintaining the standard of qualifications over time. Where the aims listed above are in tension (for example, accuracy of approach versus ease of explanation), we will seek to find an optimal balance.

To what extent do you agree or disagree with the aims outlined above?

Strongly agree

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?

Neither agree nor disagree

To what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process?

Disagree

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?

Neither agree nor disagree

To what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?

Neither agree nor disagree

Do you have any comments about our proposals for the statistical standardisation of centre assessment grades?

The suggested standardisation process will rightly reward successful schools with good historic progress scores but at an individual student level, this system could disadvantage students in centres which have high proportions of SEND, Pupil Premium and EAL students. These groups of students will struggle to re-sit (possibly every) GCSE in the Autumn alongside the new courses they will have started at their post 16 provision.

We feel that GCSE centres with high levels of SEND, PP, re-sitters and EAL should be standardised using more flexible measures that give additional weighting to professional teacher assessments.

Appealing the results

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?

Agree

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?

Agree

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?

Agree

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

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?

Agree

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

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

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?

Disagree

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

Agree

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?

Disagree

To what extent do you agree or disagree with our proposal to make the Exam Procedures Review Service (EPRS) available to centres for results issued this summer?

Agree

Do you have any comments about our proposals for appealing results?

An autumn exam series

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

To which qualifications the emergency regulatory measures will apply

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

Do you have any comments about the qualifications to which the exceptional regulatory measures will apply?

n/a

Building the arrangements into our regulatory framework

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

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

Do you have any comments about our proposals for building our arrangements into our regulatory framework?

We feel that November is still a good time for re-sits, this will give post-16 providers and students the opportunity to build a revision curriculum to prepare them very well for this event.

There are though serious concerns that students may be overwhelmed by re-sitting multiple exams whilst undertaking new programmes of study at FE centres. This could disadvantage students who are down-graded by the standardisation process to grade 3 and below.

Equality impact assessment

Are there other potential equality impacts that we have not explored? What are they?

There has been a great deal of research going on post-16 groups including the EEF 5Rs https://educationendowmentfoundation.org.uk/projects-and-evaluation/projects/the-5rs-approachto-gcse-maths-resits/ this study has shown good outcomes for November 2019 cohort and the trajectory for June 2020 was looking promising.

The 5Rs research was a large study with 2,500 students involved, their results are anticipated to be better so students re-sitting exams may well be disadvantaged by ranking and using the centres' year on year progress analysis. We have already seen the 5Rs double outcomes in the two years prior to the large scale EFF research trial which started this year.

We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated:

Regulatory impact assessment

Are there additional activities associated with the delivery of the revised approach that we have not identified above? What are they?

What additional costs do you expect you will you incur through implementing this approach?

n/a

What costs will you save?

n/a

We would welcome your views on any suggestions for alternative approaches that could reduce burden:

n/a