

Ofqual and DfE Consultation on A level and GCSE Awarding Arrangements in 2021

Consultation response from the Sixth Form Colleges Association, January 2021

A. Introduction: principles guiding our response

- We support the aspiration to put teachers at the heart of the awarding process this summer. In the absence of exams, teachers are best placed to assess a student's ability and performance, drawing on a broad range of evidence such as mock exam results and substantial candidate work.
- Although our members do not have a shared view on the exact arrangements that should be put in place to make this a reality, there are some issues on which there is broad agreement. In particular:
 - Publication of grades: The proposal to move the publication of results to mid-July is completely unworkable. The usual schedule of activities and events should be retained.
 - Awarding and appealing grades: Grades must be awarded, as they usually are, by awarding bodies. All appeals must be directed to awarding bodies, not centres.
- A guiding principle should be that teachers and centres are not put under pressure from parents and students over the next few months to award overly-generous grades, and not put in the firing line when it comes to appeals.
- This means that there must be an element of external standardisation, both in the form of papers issued by exam boards (standardisation of evidence) and in the form of clear external quality assurance processes (standardisation of processes, and potentially of grades). Last year's standardisation process was flawed and unhelpful, but its removal via the reinstatement of CAGs exposed many centres and individual teachers to an enormous amount of undue pressure. This cannot be repeated in the summer of 2021.
- Exam board papers will be particularly helpful for students who have experienced significant learning loss, and teachers who have insufficient evidence. If they are used this summer, these papers should be compulsory, but the questions should be sufficiently broad to ensure that students are not disadvantaged by the extent to which they have been able to cover the content of their course.
- These papers should be set by and marked by awarding bodies. The standard attained by students will be an important part of the evidence base used by teachers to develop a final grade.
- It is important that the awarding arrangements for AGQs mirror the arrangements for A levels. This will help to avoid disadvantaging students based on the type of qualifications they have undertaken. The responses in this consultation apply to the assessment and awarding arrangements for those AGQs used for progression to higher education, although we have not made a separate response to the consultation on VTQs.

B. Awarding grades

- We agree that the grades awarded to students in Summer 2021 should reflect the standard at which they are performing. Grades awarded should indicate their knowledge, understanding and skills based on what each individual student has covered during their course. This will help to ensure that students are not be penalised based on what they have not been taught and will help to address differential learning loss. However, there needs to be sufficient flexibility in the system to allow students to complete additional work between now and June, such that teachers can assess a range of *performance evidence* that reflects a student's full *potential*.
- Grades awarded will hold a different meaning and value this year compared to previous years - a grade B awarded to two students in the same subject will not assume that both have covered the full content, but will reflect the standard attained in the assessment of the topics covered. Therefore, we suggest it may be necessary to prepare an accompanying certificate of context which sets out:
 - How much of the specification has been covered
 - How much learning has been lost
 - Any contextual factors such as disadvantage
- This will help post-16 institutions and HE providers to identify students' gaps in knowledge and skills and put in place additional resources and support to ensure students have covered all areas required for further study.
- Teachers should make their final assessment of a student's performance at the beginning of June. This will allow students a further four months to continue to engage and work towards the outcome of their final grade. Students need to feel motivated, and they need goals to work towards which can sharpen their focus, commitment and self-discipline, and overall help drive up standards.
- Although teachers will make their final assessment in June, a range of evidence should be considered when making this final judgement from throughout the course. The type of evidence used requires approval by awarding bodies through the quality assurance process to uphold the integrity of evidence and ensure consistency across centres.

C. Papers set by awarding bodies

- Members are divided regarding the use of external papers. A narrow majority see merit in offering external papers, particularly for students who have experienced significant disruption, and teachers who have insufficient evidence, but also as a means of introducing objective nationally standardised assessment for all. If these papers are used, the following conditions and considerations are required to ensure there is transparency, consistency and fairness across subjects and centres:
 - The use of these papers should be compulsory
 - The questions used should be sufficiently broad to ensure that students are not disadvantaged by the extent to which they have been able to cover the content of their course.
 - The papers should be set by, and marked by, awarding bodies
 - The papers should be sat under the same controlled conditions across all centres, as far as the health situation permits
 - The grades awarded to students from these papers will be an important part of the evidence base used by teachers to develop a final grade, but by no means the only evidence
- Although the use of these papers should be compulsory, Ofqual and the awarding bodies should work together to draft these papers such that:

- In subjects where it is possible, one paper is offered to all students, which is drafted in such a way that individual students with different levels of lost learning can deploy their own experiences to give the best answers possible, and use what they have learned to explain their answers to a question that is relevant across topics
 - In subjects where this is not possible, multiple papers are offered covering different topics in the syllabus, from which teachers can choose as appropriate for their students
- There is a clear consensus that externally set papers should be marked externally. This use of the established expertise of experienced examiners will give a better chance of achieving consistency across all centres and candidates. Furthermore, teachers are already under intense pressure to best prepare students for their future by completing as much of the specification content as possible at a time when formal learning is still disrupted, and to carry out the proposed teacher assessed grades arrangements; it is not realistic or reasonable to place a further burden on them.

D. Other evidence

- Whether external papers are used or not, teachers will continue to build a portfolio of evidence they can draw on to make their final assessment grade. This might include additional NEA and assessments, controlled assessments undertaken during the course, and other forms of evidence teachers see fit to draw on.
- Non exam assessments (NEA) have always played a vital role in demonstrating a student's ability, knowledge and application of skills. All completed NEA should be used as a form of evidence when teachers assess a student's performance, alongside other types of substantial work.
- Awarding bodies should provide detailed guidance that helps centres to identify which assessments or pieces of work can be counted towards the grade, alongside information about how they should be weighted. A comprehensive training programme will help to ensure that standards are consistent and robust.

E. Internal quality assurance

- Awarding bodies should provide detailed and clear guidance (accompanied by training) to centres on the internal quality assurance processes they should follow. This will help to ensure that students receive a fair grade and centres are not exposed to vexatious appeals.
- In following the set process and meeting the requirements of the internal quality assurance processes, when deciding on a grade for a students, teachers will aim to:
 - Mark the students' work and adhere rigorously to marking schemes and grade boundary information, as well as grade descriptors under different assessment objectives
 - Be mindful of, but not bound by, the prior attainment of the individual and the grade profile of previous cohorts.
- In quality assuring a teacher's judgement and the grade awarded, centres will:
 - Be satisfied that the process has been correctly followed
 - Be mindful of any significant variations from established performance patterns
 - Be satisfied that there is credible and sufficient evidence to justify any such variations
- It is essential that all awarding bodies provide the same guidance on the standardisation process to ensure consistency within and between centres. A common set of delivery tasks, support materials and quality assurance standards will be needed. Centres deliver a number of qualifications from a range of awarding bodies, and it is important that students are not disadvantaged or advantaged by the different services awarding bodies provide.

- Our members agree that heads of centres should sign off the final awarded grade as part of the internal quality assurance process, but it is important to note that this will be extremely difficult for large centres to complete within the given timeframe. Given the tight schedule this year, it is essential that colleges receive information as early as possible to enable the necessary training to take place.

F. External quality assurance

- Awarding bodies should compare each centre's submitted grades with the centre's past performance. If the submitted grades are broadly similar to the centre's prior performance (with the degree of variance allowed, and its method of calculation, to be determined by Ofqual) the awarding body should approve the grades, with the exception of a randomly-selected sample of centres where calculating variance may not be statistically sound.
- This process should entail asking centres for evidence of the current cohort's unusual nature, whether by establishing that the cohort is structurally different, or by sampling teachers' portfolios of student work used to determine grades. The board should then revise or accept the grades submitted. We believe that this approach would introduce stronger incentives for teachers and centres towards something like comparable outcomes when they are determining their grades, strengthening the validity of 2021's qualifications *without* tying any individual student's or centre's outcomes to historical performance. Crucially, it does not prevent teachers from awarding deserving students much better grades than previous cohorts received, nor does it bring historical performance directly into the calculation of students' grades – it just ensures that teachers and leaders are aware that they may be called upon to justify the grades they have come to, whether they end up being sampled or not.
- This is a powerful step towards greater validity and integrity in grading, and also provides some protection to teachers and centres. Many parents and students will be hoping that teachers, given the difficulty in many cases of discerning whether a student should receive (say) a B or a C, will take an optimistic view. But with public awareness that unrealistically optimistic grades are more likely to be revised by awarding bodies, the pressure on teachers will lessen to some extent.

G. Appeals

- The proposal to move the publication of results to mid-July is completely unworkable. In order to achieve the necessary balance between delaying assessment for as long as possible in order to ensure maximum content coverage, and putting teachers' professional judgement at the heart of the grading process, there needs to be sufficient time between the June papers and the identification and submission of grades and the external quality assurance processes. Furthermore, the majority of sixth form college teachers are contracted to take their summer holiday between the end of the summer term (often late June/early July) and the usual August results day, and their contracts specify that they will work for 195 days of the year. If this is challenged, there will likely be considerable resistance from trade unions, potentially jeopardising the achievement of our common aim: valid, well-evidenced grades allocated in time to allow students to progress.
- The usual schedule of activities and events should be retained. Grades must be awarded, as they usually are, by awarding bodies. All appeals must be directed to awarding bodies, not centres.
- These appeals should only be permitted on the grounds of bias or discrimination, or data error, as in summer 2020. If the government believes that *'teacher assessment should be at the heart'* of the awarding process, it needs to protect the integrity of teacher assessment by sending a strong statement that questioning a teacher's judgement, unless based on evidence of discrimination, will not be reasonable grounds for appeal.
- A college is likely to be subjected to scrutiny if a student's predicted UCAS grade does not match their final teacher assessed grade, although the grades are measuring two very distinct things: early predictions of what the student would have achieved after their final examinations, and the

teacher assessments of the level the student is working at currently. It is important for Ofqual to make clear the distinction between the two to avoid student appeals on this basis.

H. Private candidates

- The arrangements for private candidates can only be finalised once arrangements for mainstream candidates have been agreed. We will work with officials to discuss this question, with the key aim in mind of ensuring that private candidates, some of whom have been waiting to progress since summer 2020, can receive a grade this summer without undue evidential burdens to centres or candidates.

I. Inequalities

- One of our major concerns about the assessment process in 2020 was the possibility of implicit bias affecting the grades that teachers assign to students. We were therefore very pleased to see from Ofqual's analysis of the summer 2020 dataset that there were no statistically significant differences between 2019's grades and 2020's by characteristic. However, the proposals for 2021 carry new risks to protected groups, particularly disadvantaged, BAME, and SEND students.
- Students from disadvantaged backgrounds, who are disproportionately likely to also be BAME, have in many areas been particularly affected by learning loss due to the pandemic as a result of cramped housing conditions (necessitating more frequent self-isolation) and limited access to study spaces and technology. As such, it would be wrong to assess all students on all of a course's content. Instead, as outlined above, if external papers are used, teachers should be able to use their judgement to advise students on *which* external papers to take, and to *weight* external assessments such that a student's grade reflects their performance on the parts of the specification they have covered. There are legitimate concerns about grades' suitability for progression purposes if students are assessed on this basis. We believe that providing centres with more time for teaching by lowering the assessment burden is the best solution we have available to us, along with certification by teachers of the areas of the specification on which each student has been assessed.
- If used, it is essential that awarding body papers are made available in a range of formats suitable to students with SEND (e.g. Braille, large print, and interactive formats) and can be completed using a student's existing access arrangements (e.g. extra time).

J. Burdens

- Our proposals throughout aim to achieve a proportionate and achievable division of labour between teachers, centres, and awarding bodies that is relatively similar to that experienced in a normal year.
- The current proposals on appeals risk teachers and centres being subjected to intense pressure, and even litigation, from parents and students for months to come, as many were last year after calculated grades reverted to CAGs. This must be avoided at all costs.
- For more information about this consultation response, please email

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