

Response ID ANON-FWHV-7YCB-G

Submitted to Contingency arrangements: GCSE, AS, A level, Project and AEA qualifications in 2022
Submitted on 2021-10-12 15:56:08

Personal information

What is your name?

Name:

Noni Csogor

Position (if applicable)

Please enter your position in the text box below:

Research and policy manager

What is your organisation?

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Sixth Form Colleges Association

What is your email address?

Email:

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The evidence used to assess students' performance

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

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.

Please let us know in the text box below:

Part f suggests that centres 'may' wish to limit total assessment time used to prepare TAGs to the same amount of time that would be spent on a full suite of papers for each subject in the normal summer exams to avoid over-testing. However, this is inconsistent with the advice that centres test half-termly in part b, unless those tests are very short. While it is a virtue of this year's TAG advice that it is prescriptive and allows for relatively consistent evidence to be generated and used between centres, this also means that there is an incentive for teachers to set as many exam-conditions tests as possible, particularly in centres where teachers and leaders have experienced significant parental backlash in the last two years and are keen to avoid the same in 2022. This is unlikely to be conducive to learning, particularly given the additional time pressure of covering most of the syllabus before advance information is given out on or before the 7th of February. We suggest that element f be strengthened from 'may wish to' to a much stronger directive, such as 'should'. This does not prevent centres from setting further mock exams and assessments for formative purposes - it merely suggests that they should not do so merely in order to generate further contingency evidence.

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?

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?

Disagree

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.

Please let us know in the text box below:

Already centres are devising their in-house assessment approaches, so that they make the most of opportunities to assess and identify evidence in readiness for TAGs, should they be needed. This means that a number of different approaches are being adopted already, with the inevitable consequence being inconsistency. We need a framework that sets out things like the number of assessment points, the % of specification to be tested, the extent of scaffolding, the application of exam conditions or not, and more. This guidance, that should generate a more standardised approach, needs to be published asap, so that we reach centres before they have gone too far in establishing their own way of doing things.

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

Agree

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

Please let us know in the text box below:

A national approach

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

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

Please let us know in the text box below:

Contingency arrangements for private candidates

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

Please let us know in the text box below:

We have to ensure a greater degree of consistency for all students; if we achieve this, private candidates will also benefit. Last year's problems in our experience centred around private candidates submitting evidence which could not be trusted to be their own (too much help from tutors? parents?), while tutors / parents would swear blind that they had not provided inappropriate help. Perhaps private candidates should sit at least one piece of unseen work at the new centre as a yardstick?

Quality assurance

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?

Agree

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

Please let us know in the text box below:

As in 2021, centres should be required to consider their historical grade profiles when setting TAGs, and justify significant deviations. There needs to be a much clearer steer from JCQ / Ofqual about this. In 2021, SFCs' grade improved by c.12%, while independent schools reported nearly c.4x that amount and academies c.3x that much. There is a strong suggestion that boys tend to do worse with TAGs - because they don't have the benefit of that mad revision at the last minute, that helps them achieve higher in normal exams.

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

Please let us know in the text box below:

In 2021, lack of exam board capacity and the desire to avoid the appearance of an algorithm by the back door meant that very few centres actually had their work sampled, let alone their judgments queried by exam boards. With a full year to plan for 2022, boards should be required to significantly expand their QA capacity, such that if TAGs are needed in 2022 a significant portion of centres can expect their student work to be sampled. Exam board QA has an important function as a deterrent from overly-ambitious grading as well as a corrective function in the small number of cases in which it is actually needed. In order to act as a deterrent, centres need to have some expectation that they may come to exam boards' attention. On the basis of 2021's arrangements, they do not.

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

Please let us know in the text box below:

Appeals

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

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?

Disagree

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

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

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?

Neither agree nor disagree

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

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?

Strongly agree

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

Please let us know in the text box below:

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. There is a particularly strong case for this given that the parameters for what counts as TAG evidence have been drawn very narrowly for 2022, ensuring that teacher discretion plays a relatively minimal role compared to 2021.

Equalities impact assessment

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

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

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

Yes

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.:

We are particularly concerned about the effect of potential over-testing (as explained at the start of our consultation response) on disadvantaged students and those who have missed out on the most education over the course of the pandemic. These students, who are disproportionately BAME and working class, but not exclusively, would particularly benefit from as much mainstream curriculum delivery time as possible this year such that they have the maximum level of content knowledge given the disruption to their education. To mitigate this, total TAG-related assessment time should be limited via stronger wording for element f of the guidance, as discussed at the start of our response.

Regulatory impact assessment

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?:

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. :

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. :

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

Please let us know in the text box below:

Your details

Which nation or country are you based in?

England

Other country::

How did you find out about this consultation?

Ofqual's website

Other (please specify)::

Directly from Ofqual officials

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

Which of the following best describes you?

Other representative or interest group

Type of organisation or interest group

What type of organisation or interest group do you represent?

School, college or teacher representative group

Confidentiality

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

No

If you selected 'Yes' in response to the question asking if you would like anything in your response to be kept confidential, please state clearly what information you would like to be kept as confidential and explain your reasons for confidentiality

Please state in the text box below:

Feedback

How easy to read did you find this consultation? Please rate from 1 to 5, where 1 is very hard to read and 5 is very easy to read.