CONSULTATION DECISIONS

An additional GCSE, AS and A level exam series in autumn 2020

Proposals for an additional exam series in autumn 2020 in response to the coronavirus (COVID-19) pandemic
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Introduction

On 18 March 2020 the Secretary of State for Education told Parliament that, in response to the coronavirus (COVID-19) pandemic, schools and colleges in England would shut to all but the children of critical workers and vulnerable children after 20 March. Exams scheduled for the summer would not take place. The Secretary of State said that the government would work with the education sector and with Ofqual to make sure students who were preparing to take GCSEs, AS and A level exams in the summer would not be unfairly penalised.

On 23 March 2020, in a written statement to the House of Commons, the Secretary of State for Education confirmed the government’s priority was that students could move to the next stage of their lives and that GCSE, AS and A level students would receive a grade that reflected their work. The statement explained the government’s intention that “a grade will be awarded this summer based on the best available evidence, including any non-exam assessment that students have already completed. There will also be an option, for students who do not feel this grade reflects their performance, to sit an exam at the earliest reasonable opportunity once schools are open again”.

We have since proposed, consulted on and published our decisions on how students will receive GCSE, AS and A level grades this summer (calculated grades), as well as grades for Extended Project Qualifications and the Advanced Extension Award in maths.

When the Secretary of State directed Ofqual to have regard to the government’s policy he said:

“The Government considers that students who do not feel their calculated grade reflects their ability should be afforded an opportunity to sit an exam at the earliest reasonable opportunity. Accordingly, I hereby direct Ofqual to take account of this policy and work with the exam boards and others to plan to enable this group of students to sit exams as soon as reasonably possible after schools and colleges are open again……”

On 22 May we published a consultation seeking views on our proposals for the key aspects of the arrangements for an exam series in autumn 2020.

The consultation closed on 8 June, by which time we had received 3,485 responses. A full summary and analysis of the responses has been published at the same time as this decision document.

We have indicated in this document which of our decisions relate to which question from our consultation, so that it is easy to cross reference between the documents. The numbering of the questions in the consultation went from 1 to 31 which represented all the questions in the survey. By selecting particular subjects at the start of the survey, respondents may have taken a route through the survey that resulted in them only answering relevant to their interests, therefore, changing the number sequence of the questions to which they responded. Most questions asked respondents to indicate the extent to which they agreed or disagreed with our proposals, whilst other questions asked them to comment. We have not included the numbers of these questions, as comments often spanned a number of the proposals on which we consulted.
Summary of decisions

The Ofqual Board decided on the arrangements for an autumn exam series at its meeting on 24 June 2020. The Board decided to implement the majority of the proposals we set out in the consultation document. In summary, these decisions mean that:

- exam boards must make exams available in all GCSE, AS and A level subjects in the additional autumn series and we are therefore varying our normal rules that allow exams only to be held in May and June
- exam boards must base results on students’ performance in exams alone and not on any non-exam assessment, with the exception of art and design qualifications
- exam boards must issue replacement certificates for the summer results if students request this
- the exam boards must adopt the normal arrangements for reviews of marking and appeals

Details

Requirement to run a full series of exams in the autumn

We invited views in the consultation on our proposals to require the exam boards to offer exams for all of the GCSE, AS and A level qualifications this autumn they had intended to offer in the summer. (Question 1)

There was a high level of support for this proposal (81%). Students were particularly supportive. Those who disagreed were mainly concerned about the costs and manageability of the series for schools and colleges.

These concerns were raised by, among others, groups representing school and college leaders, exam officers and by the exam boards themselves.

The exam boards suggested there was little value in offering AS exams as they are not particularly valuable for progression purposes and the numbers taking them have declined markedly in recent years. This view was shared by others too.

Some respondents commented that the series should be limited to A levels in all subjects and GCSEs in English language and maths.

A number of groups whose responses were primarily focused on the interests of students who share particular protected characteristics argued strongly in favour of students having the opportunity to take exams in the autumn if they wish to do so.

We also invited views about the proposal that an exam board that receives no entries for a qualification by its entry deadline can withdraw the exams for that qualification from the exam timetable. (Question 2)
There was a high level of support for this proposal (76%). The exam boards suggested that they should be able to withdraw the exams if they had a low number of entries, perhaps fewer than 100.

In light of the strong support for the proposal, particularly from students, we have decided to require the exam boards to run a full exam series in the autumn and to allow the exam boards to withdraw an exam for which there have been no entries by the closing date.

We also invited views in the consultation on our proposals that:

- the same number of exams should be taken by students for each qualification as they would have taken if the summer exams had not been cancelled (Question 4)
- the exams taken in the autumn series should be in the same form for each qualification as those normally taken in the summer series (Question 5)

There was support for the first (62% in favour) and strong support for the second (78% in favour) of these proposals.

Respondents who supported our proposal typically did so because this would make the autumn series authentic and would ensure students would be able to demonstrate their ability across the subject content. It would also ensure students would be familiar with the nature and format of the exams. Those who favoured a different approach commented that fewer, perhaps longer, exams would make the series more manageable for centres and for students. Some suggested that it would be unfair to expect students who had not been in school or college, perhaps for several months, to be assessed in the normal way.

Some groups representing the interests of disabled students raised particular concerns that if the exams were not in the normal form, students would be confronted with papers in an unfamiliar format and the exam boards would not have time to produce accessible and error-free modified papers (for example in Braille or large font).

The exam boards highlighted the extra costs of developing new papers in a different format and the risks of doing so.

Having considered the arguments for and against maintaining the usual number and format of exams for each subject, we have decided to adopt our proposals that exams in the autumn series should be of the same number in each subject and in the same format as the summer 2020 exams would have been had they not been cancelled.

Non-exam assessment

We invited views in the consultation on our proposal that, with the exception of art and design (for which there are no exams), students entering the autumn series should have their results based on their performance in their exams for the subject alone. (Question 7)

We proposed that any non-exam assessment undertaken by students before schools and colleges were closed should not be taken into account for the autumn series. Students’ performances in any such assessments would have been taken into
account by centres when they determined their students’ centre assessment grades. For some subjects and in some centres, the non-exam assessments would have been completed, in others they would not. Teacher marking and exam board moderation would likewise have been at different stages of completion.

We also proposed that students should not undertake new non-exam assessments for the autumn series. While we recognised that non-exam assessment is used to assess aspects of the content that cannot be assessed by an exam, we were concerned that it would be unmanageable for centres and students if we required new non-exam assessments to be undertaken in the autumn term as well as the exams.

It is likely that some students (possibly the majority) who want to enter exams in the autumn will no longer be formally attached to a school or college, or at least not to the school or college with which they had been entered for the qualification this summer. This would add to the difficulties associated with non-exam assessment, whether they completed the assessments started before schools and colleges were closed or undertook new non-exam assessments specifically for the autumn series.

There was support (46%) for the proposal that students entering the autumn series should have their results based on their performance in their exams for the subject alone. Some respondents expressed regret and made clear that their support was in the context of the additional autumn series only. Respondents who agreed typically had concerns about manageability if attempts were made to include and/or produce new non-exam assessment.

Thirty-nine per cent of respondents did not support the proposal. Those who disagreed raised a range of concerns, including about the validity of the qualifications if essential skills were not assessed, the de-motivating effect on students if the non-exam assessments they had completed before schools and colleges closed were disregarded and the impact on individual students and particular groups of students who might perform better in non-exam assessment than in exams.

As students were at different stages in their non-exam assessments before schools and colleges closed, and because many will no longer be studying in the centres in which they started their assessments in the autumn, we do not believe it would be fair (even if it were manageable) for students to complete the non-exam assessments they had started. Very few respondents suggested students should undertake new non-exam assessments in the autumn.

We understand the concerns of respondents who said that some students would perform better in non-exam assessments than they would in exams. Research indicates this is not necessarily the case, although we acknowledge that the subjects covered by the research are not those that include performance-based assessments such as drama and dance.

A number of respondents suggested that students’ autumn grades should reflect their exam performance combined with a mark provided by their teachers based on their completed or partially completed non-exam assessment. However, students’ performance in their non-exam assessments (whether or not complete) will have been reflected in the centre assessment grades provided by centres to the exam boards this summer.
Although some non-exam assessments will have been completed before schools and colleges closed this is not the case for all subjects or in all centres. We considered whether to allow non-exam assessment to contribute to the autumn grade for students who had completed the assessment before centres closed, but we decided this would be unfair to other students who would prefer their non-exam assessment to contribute, too. The non-exam assessments that had been completed would not in all cases have been marked by teachers; and the marking would not have been moderated by the exam boards. Marking and moderation would need to be undertaken in the autumn term.

If we allowed students who had not completed (or possibly even started) the non-exam assessment to finish (or start) their assessments in the autumn this would raise further questions about the manageability of an autumn exam series. Centres might not be willing to allow students who had left the centre to return to do the non-exam assessment. Teachers would need to supervise and mark the assessments, adding to the burden on them.

Another option, suggested in some responses, is not to allow performance-based subjects, such as music, physical education or dance to be taken in the autumn at all. Those who suggested this as an option were concerned about the validity of qualifications in such subjects if performance was not assessed. As we did not seek views on this option in the consultation, we do not know the extent to which it would be supported.

On balance, we believe it would be fairer to allow students who want to take exams in these performance-based subjects in the autumn to do so, even if their performance skills are not taken into account.

We have decided to adopt our proposal that (with the exception of art and design), the autumn results should be based on students’ exam performance alone.

Art and design

GCSE, AS and A level art and design are assessed using non-exam assessment only. Students complete both a portfolio (60% of the marks) and a task set by the exam boards (40% of the marks) that is undertaken under supervised conditions and completed within a fixed time period.

We invited views in the consultation on our proposal that for the autumn series students should undertake a fresh task set and marked by the exam boards. (Questions 9 and 10)

Some respondents agreed with the proposal that grades should be determined by students’ performance in a fresh task (42%) and 27% did not support the proposal. Fifty per cent of respondents supported the proposal that the task should be set and marked by the exam boards with 17% not being in support.

Those who disagreed tended to say that a student’s portfolio of work should also be taken into account and/or that they should be allowed to complete the task that they had already started before schools and colleges closed. Concerns were raised about the manageability for students and centres if a new task had to be undertaken and the time available for students to prepare to undertake a new task if that had to be completed in October/November. The exam boards also raised concerns about the
burden on them of preparing a set of new tasks (students are given a range of tasks with supporting stimulus materials from which they choose one).

For art and design, students’ centre assessment grades will have been based on their portfolios and tasks – whether or not complete.

Many centres told us that they were likely to find it difficult to accommodate students who want to enter for art and design qualifications in the autumn. We have, therefore, considered whether students who want to re-enter for these qualifications should wait until next summer.

While we recognise the difficulties, we have decided to adopt our proposal that students should be able to enter for GCSE, AS and A level art and design qualifications in the autumn, and that their grades should be based on their performance in a new task set and marked by the exam board and taken under the normal supervised conditions.

Endorsements

We invited views in the consultation on our proposals that the endorsements for A level practical science (biology, chemistry and physics) and geology and for spoken language in GCSE English language should be carried forward, as happens for students who are re-sitting in a normal year. (Questions 12 and 14)

There was strong support for the proposal (78%) for science and geology and also for the proposal for spoken language (81%).

Most of those who disagreed were concerned about students who had not completed the assessments required for these endorsements before schools and colleges were closed. However, students who had not completed the assessments could do so in the autumn term if their centres were able to accommodate this. The exam boards would then issue the students’ grade with the appropriate endorsement.

We have decided to adopt our proposal that students should be able to carry forward their A level practical science and geology and GCSE English language endorsements to the autumn series.

The timing of the autumn series

We invited views on the proposal that the exam boards should be permitted to run the autumn series from October 2020 but that we should not prescribe the dates in our rules. This would allow for the flexibility that might be needed in the light of ongoing disruption. We indicated that, if possible, AS and A level exams should take place during October and GCSE exams in November. (Questions 16 and 17).

Most respondents, 79%, strongly agreed or agreed with the proposal and 13% strongly disagreed or disagreed.

Despite the high levels of support, many respondents raised concerns about the manageability of the series and the readiness of students to take exams. Some commented that A levels should be taken earlier, to allow students to take up a
higher education place in the coming academic year. Others said that the exams should be taken later to allow for more teaching time and for exam officers to prepare to run the series.

Centres that usually enter particularly large numbers of students for GCSE English language and maths in the autumn, mainly further education colleges, are likely to face additional challenges in accommodating students in exam conditions this year.

One option to mitigate these difficulties would be to permit the exam boards to run a further series in January for GCSE English language and maths only. This would allow centres, if they wished, to split their entry between November and January. A January series would also allow for more teaching time to prepare students for their exams.

We have decided to adopt our proposal that we should provide in our rules for the exam boards to run the autumn series from October and that we should provide for flexibility on the exact timing in our rules and also allow for GCSEs in English language and maths to run in early 2021 for students who were eligible to take exams in these subjects in November if there was sufficient demand.

Reviews of marking and appeals

We invited views in the consultation on our proposal that the normal reviews of marking and appeal provisions should apply to the autumn series. (Question 19)

There was strong support for this proposal (82%) with those who agreed commenting that the autumn series should, as far as possible, be treated as a normal series so normal provisions should apply.

Those who disagreed (10%) commented that the autumn series was part of the summer appeal arrangements and so a further opportunity for appeal would be inappropriate or that allowing for reviews of marking and appeals would add further to the burden on centres. Some commented that marking should be lenient in the autumn series to reflect the time during which students taking the exams would have been away from formal teaching and that some might not have completed the full programme of study before schools and colleges were closed.

We are of the view that if the autumn series is to be, and be seen to be, the main recourse for students who believe they would have achieved a higher grade if they had taken their exams in the summer then it should replicate a normal exam series as far as possible.

We have decided that we should adopt our proposal that the normal review of marking and appeal arrangements should apply to the autumn series.

Certificates

We invited views in the consultation on our proposal that we should allow an exam board, if it wished, to issue a replacement certificate to a student who wanted only the higher of the summer calculated grade and the autumn exam grade recorded on

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1 Exam boards believe they will be able to issue A level results before Christmas if the exams are held in October.
their certificate(s) but that we should not require an exam board to do this because of the potentially disproportionate costs to them of doing so. (Question 21)

Sixty-one per cent agreed or strongly agreed with this proposal and 19% disagreed or strongly disagreed.

Comments opposing the proposal included a preference for exam boards to be required rather than allowed to issue replacement certificates and a preference for no certificates to be issued for the summer series until the results of the autumn series were known so just one certificate could be issued recording the higher of the grades. In contrast, others argued against any approach that would delay the issue of certificates for the summer or that would suggest the autumn grades were more authentic than the summer grades.

Having considered the arguments put forward in the consultation responses, we have decided not to adopt our original proposal. We will instead require the exam boards to issue to any student who requests one, a replacement certificate to show the higher of their summer and autumn grades. We will not prevent exam boards from charging an additional fee for this.

Extended Project Qualifications and the Advanced Extension Award

Our rules do not prescribe when exam boards must offer Advanced Extension Award exams nor accept submissions for Extended Project Qualifications. We invited views on our proposal that we should not impose any new requirements on the exam boards that offer these qualifications. (Questions 23 and 25)

Fewer than a quarter of respondents answered the questions on these qualifications. Of those who did respond, 65% agreed or strongly agreed with our proposal for the Extended Project Qualification and 9% disagreed or strongly disagreed. Forty-one per cent agreed or strongly agreed with our proposal for the Advanced Extension Award and 6% disagreed or strongly disagreed.

Those who disagreed tended to argue in favour of a consistency of approach with GCSE, AS and A levels.

The exam boards normally allow submissions for the Extended Project at more than one point in the year – including the autumn. Students will receive a calculated grade for the EPQ this summer. As it is unlikely students would have time to complete and submit a new project for submission in the autumn, we do not believe it is necessary for us to require exam boards to accept submissions in the autumn, although they may choose to do so.

The summer 2020 entry for the Advanced Extension Award was fewer than 400. Students will receive a calculated grade for the qualification this summer. We believe it would be disproportionate to require the exam boards to provide exams for the qualification in the autumn, although our rules would allow them to do so if they wished.

We have decided to adopt our proposal that we should not impose any new requirements in respect of an autumn series on the exam boards that offer the Extended Project Qualification or the Advanced Extension Award.
Entries for the autumn series of exams

We sought views in our consultation on the **exceptional arrangements for exam grading and assessment in 2020** on a proposal that entries to the autumn series should be limited to students who had entered for the summer series, or to those who the exam board believes have made a compelling case about their intention to have entered for the summer series. We also proposed students who would normally be entitled to take GCSEs in English language and maths in November should also be able to take exams in those subjects. There was strong agreement with our proposal (73%).

We decided to defer taking a final decision on this until we had confirmed the other arrangements for the autumn exam series.

Nothing arose in the course of the consultation on the arrangements for the autumn series that would cause us to change our minds so **we have decided to adopt our proposal to limit entry to the exams to students who had entered for the summer exams and to students who the exam board believes had intended to enter for those exams. Students who would normally be entitled to take GCSEs in English language and maths in November will also be able to take exams in those subjects.**

Implementation timescales

Following the publication of these decisions, we will now consult with the exam boards on the changes to our regulatory framework necessary to implement these decisions.

Equalities impact assessment

We recognised in the consultation that some students will be better supported and better able to prepare for an autumn exam series than others. Students in lower socio-economic groups, disabled students who are not receiving their normal educational support and students whose first language is not English are among those who are likely to be less well supported and, therefore, prepared for the autumn exams.

Respondents to the consultation reiterated these concerns. They also highlighted that students in groups that are most vulnerable to coronavirus (COVID-19) and affected by family illness or bereavement may also find it more difficult to prepare for the exams. This could disproportionately affect BAME students and disabled students.

As noted above, some respondents were concerned that certain students will receive a lower grade in the autumn than they would have received had the exams gone ahead in the summer if non-exam assessment is not taken into account.

The normal range of reasonable adjustments should be available for disabled students who take exams in the autumn. We have asked the exam boards to consider how the process for agreeing reasonable adjustments can be streamlined, for example by allowing any adjustments agreed for the summer to be used in the autumn without the need for any further application. It will be important that the exam
boards provide clear information for centres on how they should apply for and make reasonable adjustments for the autumn series.

We have alerted DfE to concerns about students in lower socio-economic groups, disabled students and Gypsy and Traveller students being likely to be among those who are less well prepared for an autumn series and shared with them the types of mitigations suggested by respondents to the consultation.

The autumn exam series is particularly important for private candidates who will not be able to receive a calculated grade in the summer. These students, while they might have been most unsettled by the decision to cancel exams and their inability to secure a calculated grade, might be better able to prepare for the exams because of their familiarity with independent learning.

We believe that our proposed approach will allow the autumn exam series to be as fair and valid as it can be for students in the circumstances given its purpose.

Regulatory impact assessment

We acknowledged in the consultation that centres, students and exam boards would all incur costs from the additional autumn series. Respondents to the consultation provided further examples of these additional costs.

Suggestions for reducing the costs – to centres, students and exam boards – included abandoning or limiting the scope of the series.

We have decided that, because of its importance to students disappointed with their calculated grade and to students unable to receive a calculated grade the series should go ahead despite the extra costs that will be incurred.