

ANALYSIS OF CONSULTATION RESPONSES

# Proposed changes to the assessment of GCSEs, AS and A levels in 2021

Proposals to modify the assessment requirements for some GCSEs, AS and A levels in response to disruption to education caused by the coronavirus (COVID-19) pandemic

**ofqual**

# Table of Contents

<b>Introduction</b> .....	<b>3</b>
<b>Background</b> .....	<b>3</b>
<b>Our proposals to change exam and assessment requirements</b> .....	<b>4</b>
Adaptations to exams and assessments that could free up teaching time .....	4
Adaptations to exams and assessments to address obstacles that could be created by any public health restrictions.....	5
Sampling of subject content .....	5
<b>Question level optionality</b> .....	<b>5</b>
<b>Changing the number and the length of the exams</b> .....	<b>5</b>
<b>Making the exams more accessible for students</b> .....	<b>6</b>
<b>Changes to the exam timetable</b> .....	<b>6</b>
<b>Proposals for each subject</b> .....	<b>6</b>
<b>Approach to analysis</b> .....	<b>6</b>
<b>Who responded</b> .....	<b>7</b>
<b>Views expressed</b> .....	<b>8</b>
<b>Question level optionality</b> .....	<b>9</b>
<b>Changing the number and length of the exams</b> .....	<b>14</b>
<b>Changes to the exam timetable</b> .....	<b>18</b>
<b>Proposals for each subject</b> .....	<b>30</b>
<b>Equality Impact Assessment</b> .....	<b>33</b>
<b>Regulatory Impact Assessment</b> .....	<b>55</b>
<b>Appendix A – breakdown of the responses for each question by respondent group</b> .....	<b>71</b>

# Introduction

The Secretary of State for Education wrote to Ofqual on 18 June 2020<sup>1</sup> to set out the government's broad policy objectives for exams and assessments in 2020/1 in the context of the coronavirus (COVID-19) pandemic in which students' education has been disrupted. He said that students taking exams or assessments next year should be able to move on to the next stage of their education or employment. He also said that the overall standard and rigour of examinations and assessments should be maintained wherever possible.

Following this, we consulted on proposed changes to the way some GCSEs, AS and A levels we regulate should be examined in summer 2021 and to the arrangements for non-exam assessments undertaken by students who will be taking exams next summer.

This is the summary of responses to our [consultation](#) that ran between 2 July and 16 July 2020 and to which we received 28,972 completed responses.

In this consultation, we sought views on our proposals on:

- adaptations to exams and assessments that could free up teaching time
- adaptations to exams and assessments to address obstacles that could be created by any public health safeguards
- sampling of subject content
- the use of more optional questions in exams
- changing the length of exams
- changing the exam timetable
- assessment arrangements for each subject

## Background

The coronavirus (COVID-19) pandemic led to the closure of schools and colleges to all except the children of critical workers and vulnerable children and to the cancellation of GCSE, AS and A level exams<sup>2</sup>.

Students expecting to take GCSE, AS or A levels exams and assessments in summer 2021 will have had their education disrupted. The extent to which students' education has continued while schools and colleges have largely been closed will have varied significantly. The extent to which students' education might be disrupted in the next academic year is also likely to vary. It is possible that there will need to be further national or local school and college closures for public health reasons.

<sup>1</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/896860/Letter\\_from\\_the\\_Secretary\\_of\\_State\\_for\\_Education\\_-\\_180620.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896860/Letter_from_the_Secretary_of_State_for_Education_-_180620.pdf)

<sup>2</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/877611/Letter\\_from\\_Secretary\\_of\\_State\\_for\\_Education\\_to\\_Sally\\_Collier.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/877611/Letter_from_Secretary_of_State_for_Education_to_Sally_Collier.pdf)

Our proposals assumed that, in line with the Secretary of State's letter to us, while there might be some on-going disruption, students will be able to continue with their education in the next academic year and take their exams and assessments.

Government policy objectives are that:

- students taking exams and assessments next year can progress successfully to the next stage of their education or to employment
- every effort should be made to maintain the standard and rigour of the qualifications, to the extent that this is possible, given the unique circumstances
- students taking A levels should be able to progress successfully to higher education
- students taking GCSEs should be able to progress successfully to A levels or other level 3 qualifications
- the content, specified by DfE, which forms the foundation of subjects should not be changed

The Secretary of State acknowledged that, despite the catch-up measures being put in place, students might not have covered some elements of their course to the depth usually expected, or at all, by the time they take their exams next summer. He therefore asked us to consider potential adaptations to the assessments, including a pragmatic use of content sampling in question papers and increasing the use of optional questions to give students more choice. The Secretary of State also asked us to explore the possibility that some or all of the exams might start later in the summer term than usual to allow more time for teaching.

We will publish separately our decisions.

## Our proposals to change exam and assessment requirements

We proposed changes to the exam and assessment requirements for 2021 that would free up more teaching time and, in limited cases agreed with the Department for Education (DfE), to sample less of the subject content. We also considered the changes that might be needed if public health safeguards remain in place.

### Adaptations to exams and assessments that could free up teaching time

We proposed, for some subjects, adaptations to the exam and assessment requirements that we believe would free up teaching time. This time could be used to help ensure all content was taught or to revisit content already covered before schools and colleges closed. Some of the proposed changes would also mitigate difficulties that could be caused by public health safeguards. We did not propose changes to all subjects and, individually, some of the proposed changes are quite modest. However, we believed that, overall, the changes will reduce the pressures on teachers and students in the next academic year.

The changes we proposed are intended to apply to exams taken in 2021 only and, in respect of non-exam assessments, only for students who will be taking their exams in summer 2021.

## Adaptations to exams and assessments to address obstacles that could be created by any public health restrictions

If public health safeguards continue, some subject requirements, particularly those that require group activities, could be more difficult for students to undertake and teachers to supervise. We suggested how these might be addressed. For some subjects the proposals are permissive; in other words exam boards would be allowed but not required to put alternative assessment arrangements in place. Teachers could then decide how best to respond.

## Sampling of subject content

The content for each qualification is determined by the government. In his letter the Secretary of State confirmed he was not minded to specify changes to the DfE content that forms the foundation of the qualifications. Schools and colleges will have already taught parts of the courses in the order that best suits them and changing the content for one year could have an impact on the qualification in future years. However, he also asked us to look at options for pragmatic use of content sampling in question papers and increasing the use of optional questions.

As ministers determine subject content, and any changes to the sampling of content may have an impact on what is taught we sought a steer on the subjects for which this would be acceptable. We sought views on proposals to sample subject content in GCSE history, ancient history and geography.

## Question level optionality

Exams do not, of course, usually test students' knowledge of all the content of the qualification. They instead cover a sample of the content. Because teachers do not know which aspects of the content will be sampled, they usually seek to teach all topics.

As requested by the Secretary of State, we considered whether the exam boards should re-design their exam papers so that students in 2021 have a greater choice of questions than usual. Students would not have advance notice of which elements of the subject content would be covered in the exam (question level optionality).

For the reasons set out in the consultation we proposed that exams in 2021 should not include more optional questions than usual, except in the specific case of GCSEs in history and ancient history where students would answer questions on optional content.

## Changing the number and the length of the exams

We considered whether we should require the exam boards to reduce the number of exams students take in each subject. This would either mean that less content was sampled or that the papers taken would need to be longer than normal.

For the reasons set out in the consultation we proposed that the number or length of exams taken in 2021 should be the same as previous years.

## Making the exams more accessible for students

While we considered whether exams should be made more accessible for students in 2021, for example by allowing them to have access to equation and formulae sheets in GCSE sciences and to the poetry anthology in GCSE English literature, we did not consult on this option. This is because the government does not support such adjustments, as they would change the way in which students would engage with key aspects of the content, for which it is responsible.

## Changes to the exam timetable

The government asked us to consider whether the exam timetable could be delayed to allow more time for teaching. We do not prescribe the detailed exam timetable, but we do require that GCSE, AS and A level exams are only available in May and June (with the exception of GCSEs in English language and maths that can also be taken in the autumn). If the timetable was to be delayed so the end of the exam period went into July we would need to change our rules.

We recognised that to allow time for marking, results might have to be delayed. We therefore sought views on timetable options.

## Proposals for each subject

We provided details about our proposals for each qualification in tables in the [consultation document](#). We invited people to comment on any subjects that interested them. We have summarised the themes that emerged across all subjects. We have then provided detailed analysis on each of the qualifications, identifying the subject specific themes without repeating the common themes. This analysis is provided in an annex to this document.

## Approach to analysis

The consultation was published on our website and available for responses, using the online form, between 2 July and 16 July 2020.<sup>3</sup> The numbering of the questions in this analysis goes from 1 to 207 with questions 1 to 13 being considered in the main analysis together with the analysis of responses to the Equalities Impact Assessment (EIA) and Regulatory Impact Assessment (RIA). Questions 14 to 207 relate to each of the qualifications and the analysis of these can be found in [the annex to this document](#). By selecting particular subjects at the start of the survey, respondents could answer only questions relevant to them.

This means that the total number responding to each question varies and the details are provided for each question.

<sup>3</sup> Some responses were submitted by email through a variety of routes. These were taken in to account when considering the analysis of our proposals but are not included in the total number of submissions or the data presented in this document.

Most of the questions were closed; respondents could indicate the extent to which they agreed with the proposals, using a 5-point scale (Strongly agree, Agree, Neither agree nor disagree, Disagree and Strongly disagree). We also asked open questions, inviting comments at the end of each section.

We have presented the data from each of the closed questions in tables and pie charts which show the proportions of responses (percentages are rounded to the nearest whole number<sup>4</sup>). We have provided additional information in an appendix about the responses from different respondent groups to each closed question. We have commented where there were distinct differences between the respondent groups and have summarised any main themes that were reflected in the responses.

Wherever possible we have referenced themes once. However, some themes were raised in response to more than 1 question, for example, question level optionality, with different implications dependent upon the context under consideration. Where this is the case, they have been included in the analysis for each of the related questions.

Respondents were invited to self-identify the group they belonged to. The number of responses reported in the tables are based on these unverified self-descriptions.

We read all responses in full, including those that did not follow the format of the consultation. Some respondents chose to express their views without specifically answering the questions asked. We considered these responses but do not include them in the data.

While we structure the report by question asked, some of the comments from respondents inevitably straddled 2 or more of the questions. As a result, we recognise that not all views expressed or the extracts we have included fit neatly under individual questions.

Where we have included quotes, to illustrate the main themes identified, we have edited some for clarity, brevity and to preserve anonymity but have been careful not to change their meaning.

## Who responded

As noted in the introduction we had 28,972 responses to the consultation.

We have given a detailed breakdown of respondent groups in Appendix A against each of the closed questions, to support a more detailed understanding of the level of support or disagreement with our proposals.

In light of the large number of responses, we have not listed the details of all of the organisations that responded. The following table is a summary of respondents by types who completed our consultation.

<sup>4</sup> This has resulted in some of the figures in the pie charts adding up to percentages that total something other than 100. For example, questions 81 and 170 total 101%, and questions 93 and 95 total 99%.

<b>Respondent description</b>	<b>Number of respondents</b>
Organisation	1,111
Academy chain	94
Awarding body or exam board	14
Employer	3
Local authority	24
Other representative or interest group	94
Private training provider	6
School or college	864
University or higher education institution	12
<b>Personal</b>	<b>27,861</b>
Awarding organisation employee	58
Consultant	69
Examiner	200
Exams officer or manager	307
Governor	57
Other	270
Parent or carer	4,195
SLT (Senior leadership team)	1,596
Student	4,083
Student - private, home-educated of any age	112
Teacher (responding in a personal capacity)	16,914
<b>Total</b>	<b>28,972</b>

This was a public consultation which asked for the views of those who wished to participate. We were pleased to receive a large number of responses, including many from students, and thank everyone for responding. We recognise that the responses are not necessarily representative of the general public or any specific group.

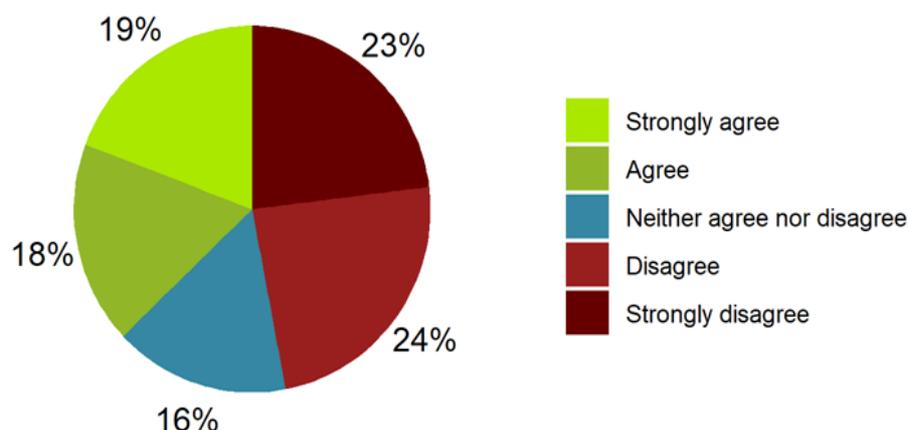
## Views expressed

In this section we report the views, in broad terms, of those who responded to the consultation document. Responses to the individual consultation questions were as follows. An annex to this document provides information on responses to the individual subject questions.

## Question level optionality

**Q1. To what extent do you agree or disagree that the 2021 exams should not include more optional questions than usual?**

**Q2. Do you have any comments on the use of optional exam questions in 2021?**



Q1 responses	Count	Percentage
Strongly Agree	5,515	19%
Agree	5,123	18%
Neither Agree nor Disagree	4,542	16%
Disagree	6,849	24%
Strongly Disagree	6,599	23%
<b>Q1 total responses</b>		28,628
<i>No response</i>		344
<b>Survey total responses</b>		28,972

Nearly half (47%) of respondents to the consultation disagreed or strongly disagreed with our proposal that exams in 2021 should not contain more optional questions than usual. Thirty-seven per cent expressed support for our proposal. We received 13,653 comments in relation to this question.

Most groups responded in similar ways. However, 5 groups showed overall more support for our proposal. These groups were academy chains, awarding organisations or exam boards, employers<sup>5</sup>, examiners and exam officers or managers.

Respondents identifying themselves as consultants, parents or carers, members of a senior leadership team and students were the most opposed to our proposal – in each of these 4 groups over 50% disagreed or strongly disagree.

Respondents who disagreed with our proposal (and therefore felt that there should be more optional questions than normal) overwhelmingly did so on the basis that

<sup>5</sup> Only three respondents identified themselves as employers. Due to the low number, this respondent group is a frequent outlier.

optional questions would give students the opportunity to answer questions on areas of the subject content which they had been able to study.

Many respondents made only general comments about this, highlighting in many cases that as schools teach subject content in different orders, some students will have learnt any given topic in class, while others may have covered it at home at a time when schools were closed.

“Optional questions will help where content has not been able to be covered in suitable detail.” (Teacher – responding in a personal capacity)

“Will need more options due to having had a reduced curriculum. Given the difference across schools, options are the best way to deal with both.” (Parent or carer)

“Students need choice to allow for any gaps caused by the crisis. As schools teach units in different order, having optional questions is the fairest way to examine them.” (SLT – Senior leadership team)

However, other respondents, while making similar points, revealed that different people had different understandings about how optional questions might work.

Many respondents were clear that, in their view, optional questions would mean that students would be able to pick optional topics, often framing this as allowing students to select questions/topics they felt more confident in answering.

“Offering optional questions means they can pick a question they have definitely covered in lesson. If students are far behind and the teachers do not finish the course but the question comes up that is on that topic, this puts them at a disadvantage.” (Teacher – responding in a personal capacity)

“How will you guarantee that at least one of a choice of questions has been studied in depth?” (Parent or carer)

“The use of optional questions could be used effectively if the topic that the question relates to is clearly labelled on the exam paper. The students need to be briefed that there are more optional questions and a front sheet could clearly label which optional question relates to which topic. There could be a few minutes before the start of the exam for the students to read the front sheet so that they know which questions are going to be applicable to them. Therefore, the content taught could be reduced to, for example, 8 of 10 topics that would normally be taught. This is not giving the student more options of questions on the same topic but is giving them an option as to the topic on which to answer the question.” (Parent or carer)

Some commented that if optional questions were available, then schools and colleges would need to know before the exams what options would be available.

“If topics are known in advance, then this may be acceptable. Reading time will need to be incorporated to allow the pupils a chance to read through the optional questions and give them the opportunity to think and choose carefully.” (Teacher – responding in a personal capacity)

“I can only see that this is of any use if the spec is divided up with alternative teaching topics. Otherwise you would still be teaching every topic. You would still have to know what to teach and what not to teach for this to be of any

value to the student and to freeing up teaching time.” (Teacher – responding in a personal capacity)

Others suggested that there should be an optional question for every topic in the specification, and (in some cases) that students should only need to answer a certain number of these.

“By using more optional questions it would ensure that students who have not studied the complete curriculum are not disadvantaged by ensuring that there is a question on every aspect. Would also ensure that it is irrelevant how colleges/schools have chosen to follow said curriculum in terms of topics taught.” (Parent or carer)

“Questions across all sections of spec with a required number to be answered e.g. 5/10.” (Awarding organisation employee)

Relatively few respondents referred to optional questions within a topic, but where they did this was viewed as a positive approach.

“If there were two options on the same topic (where normally there would only be one), this would give students more flexibility and allow them to pick the question most suited to their knowledge. A Level Sociology for example doesn't have any optional questions.” (Teacher – responding in a personal capacity)

“Perhaps the optional questions should be based on the same topic rather than two differing topics that students have to choose from.” (Student)

A number of respondents, mostly representing the official view of organisations, left detailed comments acknowledging the potential disadvantages of more optional questions, but expressing concern that more had not been done to overcome these obstacles.

“We understand the concerns that optionality may serve to disadvantage the very candidates it is intended to support. Having a range of options to choose from allows candidates who have been able to complete courses relatively unscathed to choose which questions they think they can answer most effectively – a benefit not open to students who may not have studied all the optional topics. We are also aware that papers with optional elements can be harder to navigate, which can lead to students making errors in how they respond, and that setting optional questions of equivalent difficulty generates increased complexity in standard setting. However, we are disappointed that Ofqual and the awarding bodies appear to have decided, with the exception of history, that these problems are unsurmountable. We recognise the challenges involved but believe that the alternative – that students may find themselves in the position of having to answer a question on a topic they have barely covered – is untenable. We would urge Ofqual and the exam boards to give serious consideration to how the problems with optionality could be overcome, to go some way towards recognising the very different educational experience this year's cohort will have had.” (Other representative or interest group)

“The research evidence cited within the consultation is largely focused on the relative difficulty of questions within an examination and students, particularly the less able, not always being able to identify questions that are easier. But

this issue comes down to a question of balancing risk. That is, balancing between the risk that students do not select the question that best reflects their knowledge (or questions can be set that are of equal difficulty) and ability against the risk that they are forced to answer questions on topics that they have not studied at depth due to the amount of lost learning time. As the degree of lost learning time remains an unknown, and is something that will not be known for some time, the second of these risks could grow to be even more significant. It is our view that it is prudent to accept and manage the risks associated with optional questions instead.” (Other representative or interest group)

Some respondents who agree with our proposal commented specifically that allowing options could mean that some students would not be taught all the subject content, and that this might lead to problems as students progress to further study.

“It is important for student progression that they have a knowledge of all course content before going on to university etc. Cutting corners in teaching them now for this academic year will not benefit them in the long run.” (Exams officer or manager)

“... in order to progress students need to have studied the entire course, so we could not delete one module without compromising students for the future. Therefore, optional questions would not help us prepare students for the examination.” (Teacher – responding in a personal capacity)

“Including optional exam questions may distort the teaching for the qualifications and affect progress to the next stage of education.” (School or college)

“The option to revise a limited selection of topics - rather than the whole specification - would hamper pupils' ability to access A-level material should they continue with the sciences.” (Teacher – responding in a personal capacity)

Respondents who agreed with our proposal gave a number of reasons for their support. Some of these echoed the discussion in our consultation document. Most prominently, a large number of respondents said that more optional questions would take students time to read through and may be confusing, particularly as students will not be familiar with exam papers constructed in this way.

“More questions would need more time to compensate for students to look through and decide which question to choose. This would disadvantage some students.” (Teacher – responding in a personal capacity)

“Optional questions can often be very confusing for students, and result in students attempting to answer questions they have not studied. If this is to be the new format, exam boards need to ensure they have very clear instructions.” (Teacher – responding in a personal capacity)

“I believe an increased use of optional exam questions may actually confuse some students during the exam, as well as making the pre-exam practice of completing past exam papers more difficult to do.” (Parent or carer)

“2021 exams should not be any different to normal; we have spent time preparing for a specific format of exams and changing this will not help anyone.” (Student)

“While many teachers and students have called for optional exam questions as a way of adapting next year’s specifications, including on the grounds of stress and mental health, adding more, optional questions for students to read though and choose from, while they are sitting the exam, can in itself be stressful. Students can find optional questions confusing and may mistakenly answer too much or too little, particularly when the paper structure is not familiar.” (Awarding body or exam board)

“Experience tells me that this can cause pupil anxiety as pupils spend time deciding which question to answer and then become concerned that they have answered the "wrong" question. Pupils have been known to begin to answer what they believe is an "easier" question only to get stuck half way through. If consistent fairness is an objective then the choice of questions needs to be limited.” (School or college)

Others noted that additional optional questions are likely to benefit more able students, or students who had covered more of the course and would therefore be able to choose from more questions.

“The use of optional exam questions will benefit stronger students but not weaker students (who usually pick the wrong question) as shown by research. This is because they pick questions that look easy but actually aren't. It will also be very difficult for exam boards to 'match' optional questions for difficulty.” (Teacher – responding in a personal capacity)

“Candidates, particularly weaker ones, find it very hard to select questions. This selection delays their progress and causes confusion and unease.” (Examiner)

Some respondents also highlighted the difficulties of ensuring consistency of demand between optional questions, and the challenge they might pose to examiners who would have to mark a much wider range of questions.

“Increasing the number of optional questions also poses challenges to maintaining consistent standards and reliable marking.” (Awarding body or exam board)

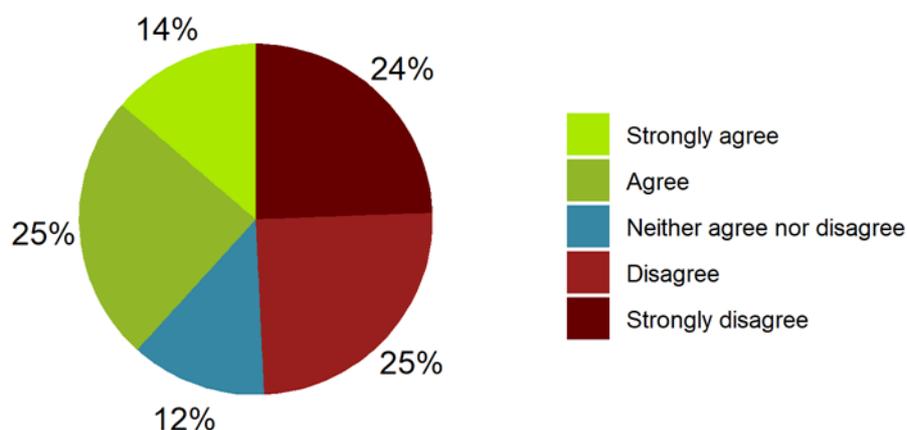
“Far too many times we've seen exam boards mark badly and capriciously. More optional questions simply leads to more chances for poor marking. It will also slow down the process of marking. A question where 1 or 2 candidates answered it is not a valid question for awarding grades - the chance in subjects, such as History, for very few candidates to answer a topic is already very high, leading to some highly skewed results.” (SLT– Senior leadership team)

“Concerns over consistency of marking across options, validity of pupils’ choices of question and accessibility for modified papers outweigh perceived benefits of optional questions.” (Exams officer or manager)

## Changing the number and length of the exams

**Q3. To what extent do you agree or disagree that the number of exams taken for each subject in 2021 should be the same as usual?**

**Q4. Do you have any comments on the number of exams taken for each subject in 2021?**



Q3 responses	Count	Percentage
Strongly Agree	3,912	14%
Agree	7,092	25%
Neither Agree nor Disagree	3,584	12%
Disagree	7,092	25%
Strongly Disagree	7,010	24%
<b>Q3 total responses</b>		28,690
<i>No response</i>		282
<b>Survey total responses</b>		28,972

Thirty-nine per cent of respondents strongly agreed or agreed that the number of exams taken for each subject in 2021 should be the same as usual. Forty-nine per cent of respondents disagreed or strongly disagreed. There were 14,476 comments received for this question.

Some who agreed with the proposal pointed out that for certain subjects, each exam relates to a specific aspect of the subject, for example in psychology and modern foreign languages. For other subjects some suggested that skills normally assessed over several papers could be assessed in the same paper, for example research methods in sociology.

“The 3 exams taken in A level Psychology relate to different aspects of the course and need to remain as 3 separate exams” (Teacher – responding in a personal capacity)

“Exams should be skills based and to demonstrate subject knowledge, for example English Language GCSE, Paper 1 could be used with an addition of Paper 2 section B. The same skills are utilised so why have both papers.” (Teacher – responding in a personal capacity)

Some comments focused on consistency so that 2021 papers are comparable with past and future years.

“The exams must carry the same weight once the qualifications are in circulation - we can't have the 2021 cohort branded as the year of easy exams.” (SLT - Senior leadership team)

Others were concerned with students' expectations.

“Pupils have a set expectation of what exams will look like. The length may not need to be the same if there is less content but I think it should stay as the same overall structure of papers” (Teacher- responding in a personal capacity)

Respondents who disagreed argued for fewer exams than usual to reduce stress and anxiety for students, to give more time to prepare between exams, to reduce workload for teachers and students and to help accommodate public health safeguards.

“Due to the loss of time, it will be incredibly difficult to prepare students for all aspects of the course - reducing the number of exams, will ensure that students (and staff) have a manageable workload, at a time where they'll be playing catch up across all subject areas.” (School or college)

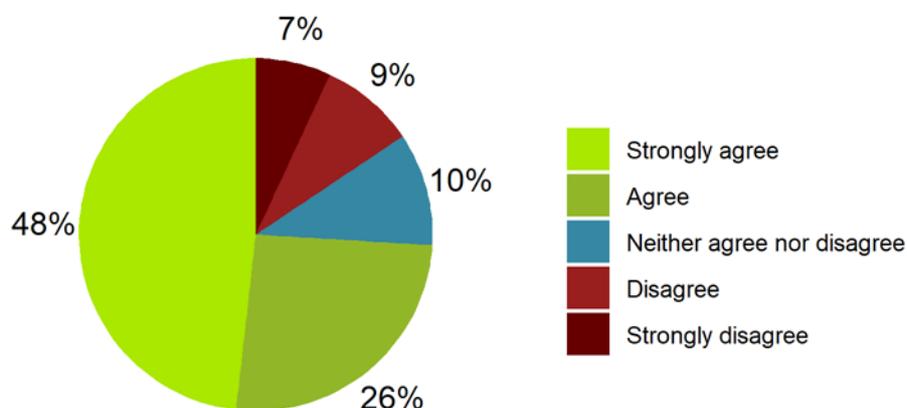
“Reducing the number of exams will reduce pressure on students who will already be dealing with mental health issues coming out of lockdown. It will also give students more confidence to approach a range of subjects rather than trying to reduce their subjects to alleviate pressure.” (SLT – Senior leadership team)

“GCSE students in particular have a large number of exams in a short space of time, if the number of exams can be reduced, then that would free up more teaching time, they can be delayed and there would be less additional pressure put on already disadvantaged students.” (Teacher – responding in a personal capacity)

“Reducing the number of exams taken for each subject will allow centres to implement social distancing and deep cleaning measures more effectively, as well as reducing the number of potential exam clashes which require students to be chaperoned between exam sessions.” (Exams officer or manager)

**Q5. To what extent do you agree or disagree that the exams taken in 2021 should not be longer than usual?**

**Q6. Do you have any comments on the length of exams in 2021?**



Q5 responses	Count	Percentage
Strongly Agree	13,758	48%
Agree	7,407	26%
Neither Agree nor Disagree	3,003	10%
Disagree	2,498	9%
Strongly Disagree	1,969	7%
<b>Q5 total responses</b>		28,635
<i>No response</i>		337
<b>Survey total responses</b>		28,972

Seventy-four per cent of respondents agreed that exams taken in 2021 should not be longer than usual. There were 10,296 comments received for this question.

Some respondents commented on the length of the individual exams and others on the length of the exam series.

Some argued for longer exams as students will be out of practice with writing and lack exam skills and would need longer to think and prepare their answers.

“Students will struggle to work at the pace needed to complete some exams after so long working at a slower pace at home- perhaps acknowledging this would ensure students are able to perform to their best. That extra 15 minutes on an exam could make a significant difference and is a small concession.”  
(SLT - Senior leadership team)

“If length of exams were extended then that would clearly allow for more thinking and planning time” (Teacher – responding in a personal capacity)

Others thought that longer exams would be tiring and stressful for students, especially those taking more than one exam in a day.

“An increase in length of exams would take pressure off students allowing them to form better answers however it may increase fatigue resulting in poorer answers.” (Student)

“Longer exams will cause great difficulties with students who need access arrangements in particular - their exams could become so long that they will struggle to concentrate and so be disadvantaged - precisely what the extra time is supposed to address.” (School or college)

Respondents also voiced concerns about logistical arrangements for very long exams, for example toilet breaks, maintaining social distancing between exams and meeting the required public health requirements

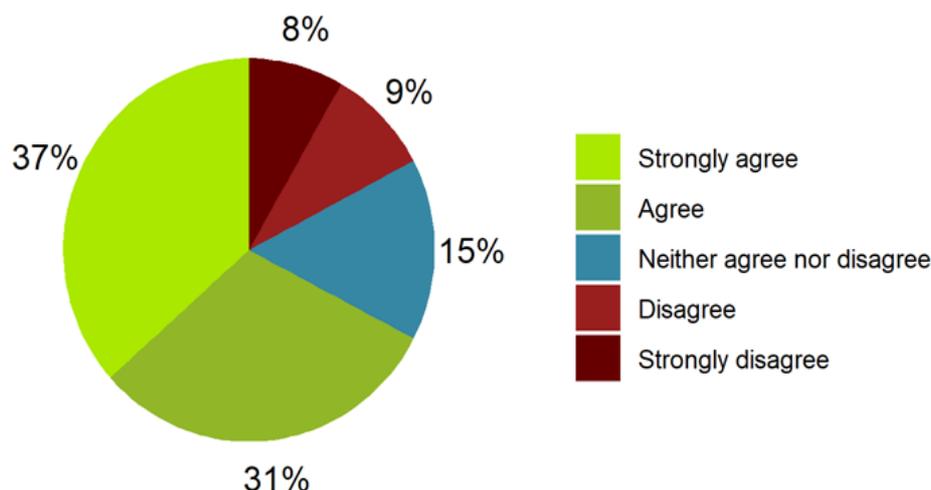
“Making exams longer in length will put greater pressure on facilities in schools, especially if social distancing is still in place, having large hall spaces occupied longer during the school day will present issues for facilitating breaks and lunches, especially as these are to be staggered across year group bubbles.” (Teacher - responding in a personal capacity)

“A longer time in exams (i.e. more than 2 hours) is a strain on anyone (maintaining concentration levels), but especially on students with SEN needs. Toilet breaks after 2 hours could also become an issue.” (Teacher - responding in a personal capacity)

## Changes to the exam timetable

**Q.7 To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 if results can still be released on 26 August 2021?**

**Q9. What would be the advantages and disadvantages of delaying the start of GCSE exams in 2021?**



Q7 responses	Count	Percentage
Strongly Agree	10,415	37%
Agree	8,760	31%
Neither Agree nor Disagree	4,363	15%
Disagree	2,566	9%
Strongly Disagree	2,359	8%
<b>Q7 total responses</b>		28,463
<i>No response</i>		509
<b>Survey total responses</b>		28,972

The majority (68%) of respondents agreed or strongly agreed that GCSE exams should start after half term in 2021 if results can still be released on the scheduled results day of 26 August 2021. Seventeen per cent of respondents disagreed or strongly disagreed.

There were no groups in which more people opposed rather than supported the proposal. However, there were 3 groups in which the rate of support fell below 50% - students, home educated students, and universities and higher education institutions.

We received 18,976 comments (question 9) which related to questions 7 and 8. We consider here comments which discussed the advantages and disadvantages of delaying the start of the exam timetable. Those in favour of delaying the exam timetable overwhelmingly commented that the additional time would allow for more teaching and revision, helping catch up following school closures.

“Greater teaching time. Incredibly important to allow for students to be able to prepare properly for these examinations and more importantly feel

comfortable with them given the enormous disruption to their education.”  
(Teacher – responding in a personal capacity)

“It would provide more available time for teaching the necessary elements of the exam syllabus. It would allow teachers more time this Autumn to focus on assessing students' gaps in knowledge and experience and offer time to plan effective interventions for those who have fallen behind. It would give students more time to feel confident again after an extended period with only remote support...” (SLT – Senior leadership team)

“Allow more teaching time, more face to face time with teachers and more revision time for those sections of the syllabus still to be taught.” (Parent or carer)

“Students will have more time to prepare which will mean that there will be less pressure on them and they will be able to revisit content that hasn't been taught in the correct manner.” (Student)

“Delaying the start of GCSE exams as late as possible in the summer term will increase teaching time. Even a small number of weeks significantly increases the teaching time available and will be important to counter some of the loss arising from the closure of schools during the pandemic.” (Other representative or interest group)

Many respondents also linked a delay to the exam timetable to a reduction of pressure on students and teachers.

“Gives both teachers and students more time to cover the context, have time to revise and to lower the pressure on everyone. The pressure on the teachers and 2021 cohort is going to be huge and will have a huge effect on the wellbeing of staff and students.” (Teacher – responding in a personal capacity)

“Students get more time with their teachers to embed skills and subject content. Reduces the pressure on students and staff to complete the required content and allows us to reteach content that has been delivered remotely as a large number of disadvantaged students have not accessed or understood the remote learning and the gap is massive between advantaged and disadvantaged.” (School or college)

A much wider range of disadvantages to delaying the GCSE exam timetable were identified by respondents, including practical and administrative difficulties which could be costly. Many noted that holidays will have been booked and events such as weddings arranged, which would need to be cancelled or postponed, possibly at significant cost (affecting students, teachers and other school or college staff).

“I don't feel that moving the exams by a couple of weeks will help the students. As a parent this will also cause problems for holidays / activities already booked for after the exams should have finished. These will now need to be cancelled.” (Parent or carer)

“Provisional exam tables have already been issued and holidays have been booked around these, although they are provisional parents are not used to them changing this significantly and students will be missing from exams.” (Exams officer or manager)

Some respondents observed that schools and colleges may need to employ staff to work in holidays which they would not normally have to do, which would have implications for their budgets

“From an administrative point of view, it could affect our term end date (normally last week in June) This would have knock on effect on staffing and holidays.” (Exams officer or manager)

“School holidays need to be adhered to, many colleges offer GCSEs and work on a different academic year to schools so staffing would need to be factored in.” (Teacher – responding in a personal capacity)

“We wouldn't have time to complete the post exam admin before the end of term. The majority of exams office staff across the UK are term time only and aren't allowed to take time off during term time so would lose valuable down time, probably with no extra pay.” (Academy chain)

Difficulties with exam space were also raised.

“Conflict with A levels - shortage of space and staff for running the exams. Additional workload for staff and students in run up to exams.” (Teacher – responding in a personal capacity)

“Delaying provides the clear advantage of more teaching time; however, it does present logistical problems in school - still teaching the year 11 group, whilst running the exam season for year 13 as normal. In terms of space, this may present some problems.” (School or college)

“...also logistically for some schools running the core GCSE exams alongside the A levels will probably be impossible as they will not have the exam halls/invigilators if smaller rooms are required. Plus the students with additional needs.” (Teacher – responding in a personal capacity)

Respondents from Leicestershire explained that any delay to the exam season would have a particular effect on them.

“Leicestershire summer holidays begin on July 9th and I am concerned that a later start to the exam season will mean that these students are not able to complete their exams during term time, which is unacceptable.” (Parent or carer)

“In Leicestershire we finish in the first week of July and so students and teachers alike will already have holidays booked when the exams might still run. These cannot be cancelled as they will have been moved from this year due to lockdown.” (Teacher – responding in a personal capacity)

Similarly, some respondents from independent schools said that they also finish earlier than most state schools, and they may have higher costs for example to cater for students who board.

“As an independent boarding school, delaying the start of GCSEs would have a huge impact on us. We would have to keep the school open during usual holiday time as exams would run longer than planned. This would have a huge financial impact on the school.” (Exams officer or manager)

“Our school breaks up for the summer on 2nd July and with many International boarding students we could not accommodate them after this

date. The exams would not all fit in between 7th June and 2nd July so we would be at a disadvantage as these and possibly other students may have to miss their exams.” (Exams officer or manager)

“As a teacher in an independent boarding school, starting late creates a whole host of issues - will exams now run into the summer holiday? If so, who will supervise pupils boarding in the school, will the pupils still need to be taught, will term need to be extended for everyone? This suggestion is financially mad, ignores pressures on teachers and makes things worse.” (SLT – Senior leadership team)

Some respondents said that most teachers use the end of the school year to prepare and plan for the next academic year and develop the curriculum and teaching materials.

“Delaying them would have other implications for school planning. We use June/ July to plan for September and prepare for Year 6 transition.” (SLT – Senior leadership team)

“Teachers timetables are generally relieved after examination classes have concluded. This can give some "gained time" for future planning. This would be lost and therefore may impact the following year group.” (Teacher – responding in a personal capacity)

Some were concerned that school trips, events, or enrichment activities may need to be cancelled if staff are still preparing students for exams.

“Educational residential trips are planned to occur during the exam season so staff can be released however this would not be the case.” (School or college)

“Schools have a lot of activities in that Summer term that require staff to be out of school/out of teaching. e.g. trips, sports days, school plays etc. Having later exams will mean schools may not be able to provide this.” (Teacher – responding in a personal capacity)

Other respondents were concerned that delayed exams would mean a shorter summer holiday.

“Pupils should be able to look forward to the same "long summer" that all previous year 11 groups will have had. This is a good time for them to prepare for further education, or work-experience. They deserve to have their grades in August so that they are prepared for their next stage in life from September onwards.” (Teacher – responding in a personal capacity)

“They have been under so much pressure lately that I think it is as important for them to still have a longer summer to enjoy, relax and have the opportunity to earn some money with a summer job.” (Parent or carer)

A large number of respondents raised concerns that a delay might cause students more stress, have a negative impact on mental health and wellbeing; and that students would be tired.

“Lockdown has been hard for teens, extending the studying period will no doubt result in burnout for some kids, I feel the extra time would be detrimental to their health, the extended period just makes the academic year too long. Exams should take place at the normal time.” (Parent or carer)

“This coming year will undoubtedly be extremely stressful (especially through the winter months), how long can the exam year pupils and teachers shoulder this stress? I fear burnout and mental health issues will be greater the longer the exam year runs.” (Teacher – responding in a personal capacity)

“However, a disadvantage would be that pupil stress levels and subsequent mental health could be negatively affected, as they have more time to build up stress about the upcoming examinations.” (Student)

Lots of comments expressed doubt that a relatively short delay of a few additional weeks would make up for months of lost teaching.

“The time gained by pushing the start back to after half term does not make up for the 4 months of lost face to face teaching time.” (Parent or carer)

“An extra three weeks of teaching just before exams is unlikely to make up for the loss of more than one term of specialist teaching in Y10 but will likely put increased pressure on the students.” (Teacher – responding in a personal capacity)

“I don't see how this would be a viable option as a 3-week delay does not make up for 5 months loss of teaching.” (Student)

Some respondents expressed concern that a delay to the start of the examination timetable might mean that the timetable would be condensed with lots of exams squeezed into a short period of time.

“Disadvantage: reduced time between exams - could result in increased cognitive overload - already difficult period as is.” (Teacher – responding in a personal capacity)

“Disadvantage: presumably a highly-condensed time-frame for examinations, leading to exam days of longer length, pupils/students sitting more exams on any one day, which could lead to greater stress and fatigue; these factors could lead to weaker performance.” (Teacher – responding in a personal capacity)

Other respondents noted that starting exams after half term would mean that students would lose the benefit of the half term break mid exams, which is often used to rest and revise.

“The half term break is a valuable and important rest for the students so we need to retain this.” (Teacher – responding in a personal capacity)

The disadvantage to this is that the students may not have the half term break “to rest/revise before resuming the exam period - a whole 4-week period of non-stop exams could exhaust them.” (Parent or carer)

“But the June half term is an important mid-point between exams for students to rest/ revise and recharge. I think a delayed extended period with no easing up of exams could actually be worse for student performance. Half term is an important well-being rest to pick themselves up for the remaining exams that follow.” (SLT – Senior leadership team)

Some respondents were concerned about heat and pollen counts.

“My son suffers badly from hay fever and therefore it's better for him to take them earlier.” (Parent or carer)

“Disadvantage is that students with hay fever will be disadvantaged as it is high pollen count in these months. The halls will be extremely hot and this is not fair on the students.” (Parent or carer)

“Climate conditions: The later exams are left the hotter it becomes, the more potential for hay fever issues. Lack of parity with previous cohorts who have completed exams in cooler temperatures.” (SLT – Senior leadership team)

Many respondents noted that if exams are delayed but results days are not then the period for marking will be compressed, which may reduce the quality of marking. Many respondents were concerned that teachers may be less willing to mark further into the holiday period.

“However, adequate marking time MUST be afforded to ensure accurate marking. Examiner recruitment is challenging and ensuring consistency of marking is also challenging. If you give examiners less time, they will make mistakes.” (School or college)

“Compression of the marking process into less time would potentially cause instability in quality of marking. Examiners are already marking too many scripts in too short a time for too little compensation. This element is most crucial.” (Teacher – responding in a personal capacity)

“Disadvantage is that, as a senior examiner and chief examiner in English language, the marking of exams takes time and a tighter deadline would potentially put off examiners (who often Mark once year 11 have gone and have extra time) and also make it unmanageable.” (Examiner)

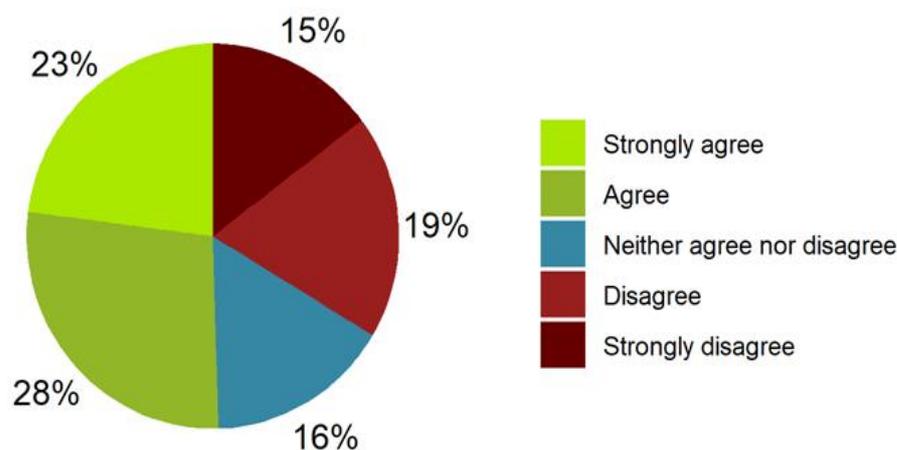
“The marking schedule is tight enough. As an exam marker, papers are often still being marked a week before results are released. Delaying exams means many markers are away on holiday during the peak marking time.” (Teacher – responding in a personal capacity)

“Teachers won't want to be working through the summer holidays marking as that is one of the few times of year they can actually focus on their families, and not somebody else's children.” (Teacher – responding in a personal capacity)

“Disadvantages: Later exams mean a shorter marking and awarding window, with increased risks to marking accuracy; Bottlenecks at Parcel Force and in scanning bureaus, as large subjects will be sat closer together and scripts will all be moving at once; Delays to marking caused by processing bottlenecks and availability of senior examiners to complete standardisation and quality checking across multiple components; Availability of examiners during July and August, many of whom will have deferred holidays from this summer and will not have the option to cancel...” (Awarding body or exam board)

**Q8. To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

**Q9. What would be the advantages and disadvantages of delaying the start of GCSE exams in 2021?**



Q8 responses	Count	Percentage
Strongly Agree	6,523	23%
Agree	7,819	28%
Neither Agree nor Disagree	4,521	16%
Disagree	5,365	19%
Strongly Disagree	4,183	15%
<b>Q8 total responses</b>		28,411
<i>No response</i>		561
<b>Survey total responses</b>		28,972

Respondents were less supportive of our proposal to delay the start of GCSEs until after half term if it meant also delaying the release of results. Nonetheless, over half (51%) still supported the proposal, with 34% opposing it.

Respondents in 4 groups disagreed more than agreed. These were employers, local authorities, universities and higher education institutions, and students.

Over two-thirds (68%) of the respondents who supported our proposal based on results day staying the same (question 7) also supported the proposal if results day were to move.

Of the 4,925 respondents who disagreed or strongly disagreed if results day were not to change (question 7), 84% also disagreed or strongly disagreed if results days were to move

Some thought it would be worthwhile to delay results.

“Even if results have to be delayed for a few weeks, this is a price worth paying for an extra month's teaching / revision.” (School or college)

“The disadvantage is that it may delay results, which will have knock-on effects on level-3 courses, but it is worth it for the additional teaching time in year 11.” (SLT – Senior leadership team)

“However, If there are delays in the release of results, it is very likely this would have a serious knock on impact on university and sixth form admissions, giving students less time to make important choices, and perhaps limiting the scope for remarks/reviews of marking. However, I think when weighing up the costs and benefits of delaying exams, the benefits to students of later exams would be significant enough to make it worth making this trade off.” (Teacher – responding in a personal capacity)

The exam boards were clear that the timetable could only be delayed if results days were put back.

“Although we can see the value of delaying exams and are hugely sympathetic to this proposal, we do not see how it can be met without also delaying results days. The time for marking, awarding and issuing results is already squeezed beyond comfort and the paramount objective must be to deliver the correct results on time especially for students who have already experienced so much disruption and uncertainty Results days in 2021 already fall later in the year than usual.” (Awarding body or exam board)

“It would not be possible for exam boards to complete marking, standardising and awarding unless the results days were also moved back two weeks.” (Awarding body or exam board)

There were concerns that a delay to the release of results would have an impact on students’ progression.

“Delaying results brings another delay to starting the next academic year. Working at a college it is already hard to enrol all students in the time frame we have (from results day).” (Teacher – responding in a personal capacity)

“Pupils need to know their GCSE results by the start of September at the very latest, otherwise they can’t make informed final choices re A Levels.” (Teacher – responding in a personal capacity)

“If results days were to be moved this would be a significant undertaking and would require careful planning and consultation across the education system and more widely. This may not, however, be a disproportionate response to the impact of Covid 19.” (Awarding body or exam board)

“Some university applicants need to acquire certain GCSE results in order to progress to higher education. Delayed receipt of these results could disrupt the admissions process for such applicants, as some might receive their required GCSEs later on in the process than currently. It is therefore important that the GCSE timetable is broadly aligned with the admissions timetable.” (Other representative or interest group)

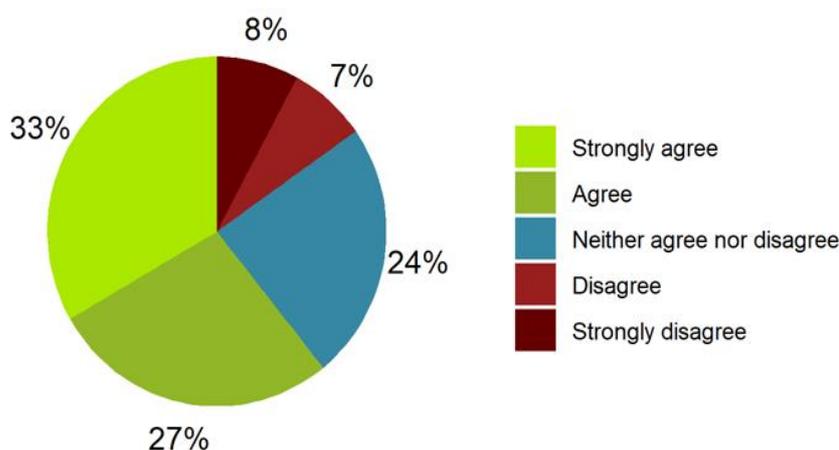
“A release of the GCSE results after 26th August could have a negative knock-on effect on 6th form and college enrolment. This would ultimately lead to a third academic year (2021/22) being affected adversely by the pandemic.” (Other representative or interest group)

Others felt these concerns could be managed.

“Whilst a delay to exam results would be unfortunate, it would not be disastrous. Few things rely on prompt release of GCSE results. I spent my whole teaching career working in sixth form colleges and specialising in guidance and admissions. Sixth form places are contingent on results but these are often managed internally and decisions are frequently still being made even after the autumn term has started!” (University or higher education institution)

**Q.10 To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 if results can still be released on 19 August 2021?**

**Q12. What would be the advantages and disadvantages of delaying the start of A level and AS exams in 2021?**



Q10 responses	Count	Percentage
Strongly Agree	9,293	33%
Agree	7,650	27%
Neither Agree nor Disagree	6,674	24%
Disagree	2,070	7%
Strongly Disagree	2,189	8%
<b>Q10 total responses</b>		27,876
<i>No response</i>		1,096
<b>Survey total responses</b>		28,972

The majority (60%) of respondents agreed or strongly agreed that AS and A level exams should start after half term in 2021 if results can still be released on the scheduled results day of 26 August 2021. Fifteen per cent of respondents disagreed or strongly disagreed.

There were no groups in which more people opposed rather than supported the proposal. However, there were 3 groups in which the rate of support fell below 50% - students, exams officers or managers, and employers.

We received 13,921 comments from respondents to question 12. These comments applied to the proposals in both question 10 and 11. We consider here comments

which discussed the advantages and disadvantages of delaying the start of the exam timetable. Comments about the AS and A level timetable were similar to those for GCSEs.

“The advantages would be that there’ll be more time to go over the topics that A level students like myself have had to teach themselves during the pandemic. Many have struggled to find the motivation to teach themselves a topic that they know nothing about, and also many have struggled with different situational circumstances. The exams in 2021 should start after the half term, for the sake of the students.” (Student)

“The advantages are that it claws back some time for teachers to deliver as close to the full curriculum to students as possible, making their education match more closely that of children in previous years.” (Teacher – responding in a personal capacity)

Many noted that A level exams usually start later than GCSEs, so a delay to after half term would be less significant.

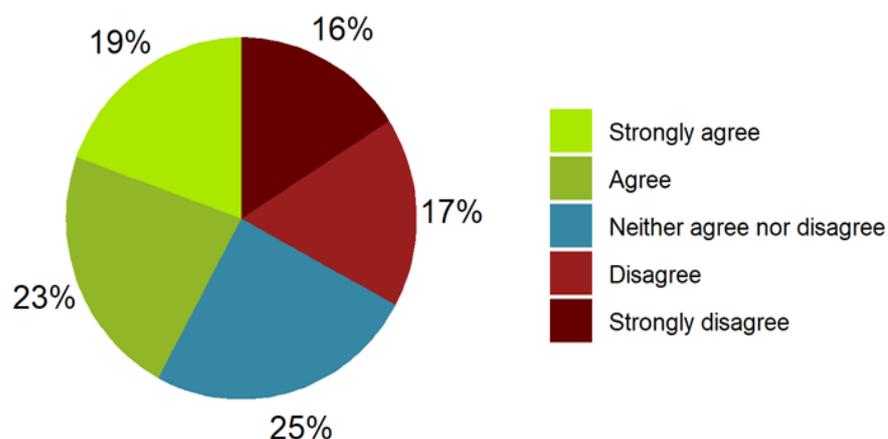
“Most A level exams usually start after half term, so cannot see that there will be much difference.” (Teacher – responding in a personal capacity)

“Again, slightly longer to teach content. The majority of A-Level papers are after half term anyway I’m not sure how I feel about the AS being pushed later.” (Teacher – responding in a personal capacity)

Respondents identified a wide range of disadvantages similar to those raised for GCSEs, for example about hay fever, booked family holidays, students’ post-exams travel plans, the value of the half term break in exams, students becoming tired, pressure on examiner recruitment and marking and disruption to school trips and other activities.

**Q11. To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

**Q12. What would be the advantages and disadvantages of delaying the start of A level and AS exams in 2021?**



<b>Q11 responses</b>	<b>Count</b>	<b>Percentage</b>
Strongly Agree	5,426	19%
Agree	6,315	23%
Neither Agree nor Disagree	6,945	25%
Disagree	4,727	17%
Strongly Disagree	4,441	16%
<b>Q11 total responses</b>		27,854
<i>No response</i>		1,118
<b>Survey total responses</b>		28,972

This proposal was supported by 42% of respondents, while 33% opposed it.

Thirteen groups on balance favoured the proposal while 6 groups, on balance, opposed it: local authorities, universities or higher education institutions, exams officers or manager, parents or carers, students, and home-educated students.

We received 13,921 comments in relation to these questions.

Again, responses to this question were very similar to those for GCSE. The key difference was a much clearer focus from respondents on the impact of delaying results on admissions to Higher Education (HE).

Some respondents said they did not expect problems for HE admissions if results are delayed as there will be time to sort out university places before September.

“As universities have the option to start later in September, this delay would have less impact than the delay to GCSE results.” (SLT – Senior leadership team)

“There would be less disadvantages since most university courses don’t start until the end of September anyway, but it depends on how long the delay is. The exam boards could try to hire more markers?” (Student)

“Most English universities do not start term until late September anyway so there would still be plenty of time to organise results. The only issue would be for Scottish Universities whose term dates begin earlier.” (Teacher – responding in a personal capacity)

Other respondents argued that university start dates would have to be delayed if results were delayed but often they played down the impact of this by suggesting that HE has some flexibility.

“Less of an impact on the transition to university as the university year is structured differently to schools and colleges. They have a bit more flexibility to change their start/end dates...” (Teacher – responding in a personal capacity)

“Universities can always delay the start to their first year until the October half-term by stopping Fresher’s Week etc. to make up the time.” (Teacher – responding in a personal capacity)

“The situation regarding A-level results is more contentious than for GCSE, since students hoping to continue to study at universities are dependent on the system which, at presents, relies on effective time management around A-level results publication and university admissions. As someone involved in

examining for a major awarding body at both A-level and GCSE levels I foresee more difficulties at this level UNLESS the agreement of universities to any change can be obtained.” (Teacher – responding in a personal capacity)

Others suggested that this would be an opportunity for a reform of the UCAS process, with offers made post results.

“This would only work if university started in January with post application, if that is possible this would be a good outcome, if not it is a disaster for students and universities who need the results in August.” (SLT – Senior leadership team)

“Why not use this as an opportunity to completely re-examine the process of university applications? The predicted grade system has long been a flawed model that disadvantages students from poor backgrounds - while we are dealing with these extraordinary times, why not look at re-imagining the whole timetable and approach to university applications?” (Teacher – responding in a personal capacity)

Six higher education institutions commented, emphasising that a system-wide delay to university admissions would be complex and would need careful consultation.

“If A Level results were delayed, this would mean that universities would need to reconsider their term start dates, to allow clearing to take place. This would need a significant level of consultation with the sector before any agreement could be reached, as all universities would need to do this to ensure that no student groups were disadvantaged. Consideration would also need to be given to dates for vocational examination results to also ensure that no student groups would be disadvantaged.” (University or higher education institution)

“Unless this decision is taken in conjunction with changes to the UCAS/University admissions timetables a change of this nature with results released post 19th August cannot be facilitated for these students to then enter Higher Education in 2021 entry. The scale of change related to the next steps for these students is too large to be considered in isolation by Ofqual/exam boards and more detailed assessment of the risk/benefits is required before this proposal could seriously be considered.” (University or higher education institution)

Some suggested that changing the assessment arrangements, or to the content, would be more beneficial than a few weeks extra time. These issues are discussed elsewhere in this analysis.

“The students have missed so much teaching time that simply pushing the exams back by a few weeks will have little impact. there needs to be a more radical change to next year’s exams.” (Teacher – responding in a personal capacity)

“We have still missed over three months of teaching and learning and a few extra weeks of revision cannot do much about that - it would be more appropriate to get rid of the content learned in the lockdown period so effectively no content would've been missed.” (Student)

“Reducing the number of exams or the content assessed would negate the need for changes to the GCSE/A Level timetable and remove any extra

pressures this would put on marking (for your consideration – the vast majority of these are also teachers and will be under large amounts of pressure next year).” (Teacher – responding in a personal capacity)

## Proposals for each subject

### **Q13. The consultation included proposals on a subject-by-subject basis. Respondents used a list of subjects to select those on which to answer questions.**

Question 13 asked respondents to select the subjects in which they were interested. They were then invited to answer questions on proposals for the GCSE, AS and A levels in those subjects. The analysis of responses for each subject is provided in a [separate annex](#) to this document.

There were a number of over-arching themes in the comments about the subjects. These themes were in responses from all groups although, as noted in the data, most responses were received from teachers, parents and carers and students. They are summarised below and are not repeated in the separate, subject specific analyses unless there was a particular impact on a subject.

#### **Volume of content**

Many respondents were concerned about covering all the content, given the lost teaching time and the difficulty of covering it in a normal year. This was raised for most subjects at GCSE, AS and at A level.

Respondents often suggested this could be addressed through question optionality, which is discussed further below. In some subjects, for example GCSE religious studies and GCSE English literature, parallels were drawn with GCSE history and respondents urged that similar arrangements were made to enable content sampling in their subject.

#### **Optionality**

Many respondents suggested that optional questions in exam papers would help to address their concerns about the volume of content to be covered. As noted in the analysis of Question 1, there were different understandings of the implications and impact of optional questions. For example, some suggested giving students a choice of questions to answer without reducing the content that had to be taught (question level optionality), whereas the majority talked about optionality in terms of students and teachers knowing before the exam which content the questions would cover (questions on optional content).

#### **Availability of additional materials in examinations**

In a number of subjects, for example GCSE sciences and GCSE English literature, respondents proposed that additional materials should be available for students in their examinations. These included texts, poetry anthologies and formulae sheets. This is discussed in the published, detailed consultation document under ‘Making exams more accessible for students’. We did not invite views on such approaches, as this was not supported by the DfE which is responsible for the subject content.

However, respondents felt sufficiently strongly about this to challenge the rationale in the consultation.

### **Consistency between GCSE and A level**

Where changes had been proposed at GCSE but not at A level, many respondents were of the view that the circumstances for students were no different and that similar changes should be introduced, for example, the removal of a specific number of days of fieldwork in A level geography and the removal of content by removing non-exam assessment in A level history.

### **Impact on progression and motivation**

Some respondents argued that the proposed changes would have a negative impact on students' ability to progress and should not, therefore, be introduced. For example, making the assessment and reporting of students' speaking skills in GCSE MFL an endorsement rather than contributing to the subject grade. Some were concerned that the aspects of the course students most enjoyed would be removed, diminishing their motivation for the subject. For example, the proposed changes to the non-exam assessments in GCSE media studies. However, others argued that the proposals did not reduce the content enough and that students would be overwhelmed trying to complete their course of study.

### **Introducing different means of assessment**

Many of the responses suggested the use of different forms of assessment including coursework, unmoderated teacher assessment and, in some cases, that exams should not take place and the 2020 arrangements used again. Many suggested that grade boundaries should be adjusted to recognise the lost teaching time.

### **Continuing disruption**

Some respondents were concerned about the continuing impact of coronavirus (COVID-19) on students' education and its impact on the fairness of the proposals for some or all students. This issue is discussed under the analysis of the Equality Impact Assessment below.

### **Understanding of proposals**

Respondents asked for further clarification on some of the proposals. In some cases, this was because the wording of the proposed regulatory assessment arrangements did not mirror the details of individual exam board specifications. In other cases, this related to concerns that the proposals might impose a change upon the assessments. For example, whether the intention to 'permit exam boards' meant that they had to comply with the changes and whether the reduction in minimum performance times in subjects such as music would result in that part of the assessment carrying the same or reduced weighting to the overall grade etc. In all cases they urged the exam boards to provide swift and comprehensive guidance.

### **Changing direction of responses**

During the consultation period there were a number of public discussions on topics related to the on-going challenges facing education. Some suggested that there should be a greater focus on 'core subjects' (this sometimes referred to GCSE English language and mathematics only but at others it was broadened to include the EBacc subjects). While such options were not raised in the consultation some respondents commented on wider issues. This led to responses that focussed on

education policy which is beyond the remit of the consultation and, therefore, this analysis.

### **Proposals do not go far enough**

Many respondents were concerned there will be insufficient time to catch up on 3-4 months missed work, that the proposals do not go far enough and risk setting students up to fail. They argued the adjustments need to go further to reduce the burden on teachers and students and, in many cases, they referenced the impact on students' and teachers' mental health and wellbeing which is covered in the Equality Impact Assessment and Regulatory Impact Assessment sections. Many respondents felt strongly that it was unfair only to make adjustments to some subjects and not in others. They urged us to do something for all subjects and, in particular, for A levels. They proposed that we should: reduce content/introduce question optionality (see comments above and analysis of Question 1); enable students to be assessed on fewer topics; have advanced notice of the topics to be assessed and there should then be fewer exam papers and questions; exams should allow access to books and/or formulae sheets; exams should be longer to allow students to recall facts (see analysis of questions 5 and 6); increase the use of multiple choice questions and reduce the use of extended answer questions.

### **Make limited adjustments only**

However, there were alternative views too. Some respondents argued that there should be no adjustments or limited adjustments to assessments and emphasised that centres have prepared students on the expected formats over many years and have preparatory materials in place. Big changes could have a negative impact on students' performance, particularly disabled students and those with special educational needs, and will introduce burdens on teachers and students to plan and learn new approaches. They also suggested major changes would be unfair to schools that have worked hard to continue to teach students during lockdown. While they believed it was right to consider giving extra time and/or to reduce the volume of assessment, for example by removing a paper or reducing the number of questions, they strongly believed the assessments should either not be changed at all or in limited ways only. They believed it was preferable not to change NEA activities that may have already been started or even completed by centres under existing rules – time and effort would have been wasted if these 'count for nothing'. They were concerned that any content reduction may mean students are less well prepared for FE, HE or employment and, in their view, the 2021 exams must have same status and value to HE and employers and not be seen as 'second best'

Some suggested that the lost time in education should be addressed by statistical standardisation to ensure the usual distribution of national results.

# Equality Impact Assessment

We explained in the consultation the potential impact of our proposals on students with particular protected characteristics and we asked:

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

We received 12,782 comments in response.

### **The closure – and reopening – of schools and colleges**

Respondents identified great variation in how well students have been able to continue with their education after schools and colleges largely closed, with some participating in a full programme of remote teacher-led learning and others completing no learning at all. Many highlighted disparities in students' access to IT.

“Quality of learning during lockdown and ability to access online learning for groups of students has been hugely variable.” (Teacher - responding in a personal capacity)

“Many students without access to the internet/computers have not been able to access remote learning since the lockdown began. Therefore, the most economically disadvantaged students have missed out on a significant amount of learning time.” (Teacher - responding in a personal capacity)

“Students without access to a computer like myself are at a huge disadvantage as I can't even do the work that's set for me as it all requires a computer and not to get sympathy but my family isn't really in a place to buy a computer especially during the pandemic.” (Student)

“Government laptops have been slow to arrive and in some cases haven't, meaning some students will have received minimal teaching time and have had limited access to their teachers.” (Teacher - responding in a personal capacity)

“Students with limited or no online access having been severely impacted during lockdown. Such students are disproportionately Pupil Premium and/or BAME.” (Teacher - responding in a personal capacity)

“Gypsy, Roma and Irish Traveller pupils are very disadvantaged in their education and require significant catch up in the academic year 2020/21. During lockdown many pupils from these communities have missed out entirely on their education due to digital exclusion.” (Other representative or interest group)

“Access to computers is not an issue for poorer students only. My wife and I are keyworkers and have been working from home. There has been an issue in not having enough devices for four of us to work on. Therefore, there has been sharing between the children.” (Parent or carer)

“Rural areas with poor internet coverage have seen a greater disengagement of pupils from home learning.” (Teacher - responding in a personal capacity)

Respondents identified that disadvantaged students are also less likely to have had access to subject-specific resources while learning from home.

“Access to technology outside of school for [computer science] pupils that are completing the programming project. Many pupils will not have the technology required to undertake this work.” (Teacher - responding in a personal capacity)

“More affluent [music] pupils will be more likely to have the hardware and software at home that means they could continue composing and sharing with their teachers for feedback. Only a tiny proportion of my pupils are in that position..” (Teacher - responding in a personal capacity)

“Those [physical education] students with access to private sporting facilities over lockdown will have been able to continue to practise their sport when others could not, therefore creating inequality.” (Teacher - responding in a personal capacity)

“The cost of digital theatre [for drama students]. It is very expensive for a state school.” (Teacher - responding in a personal capacity)

“If we continue to do remote learning then those [art and design] students taking photography or 3D courses will not be able to do this from home - some students don't have cameras and Photoshop - and are already behind with learning these skills.” (Teacher - responding in a personal capacity)

Respondents identified that the disparity in students' home environments may have had an impact on their ability to learn at home.

“Children who have been isolated in abusive households will be at a great disadvantage to their peers; DV [domestic violence] is not discussed, there are betrayal and shame implications around requesting help; these children will be recovering from trauma whilst trying to catch up academically.” (Teacher - responding in a personal capacity)

“Disadvantaged students are missing the structure and rigour and safe space that school affords them yet you are on the whole suggesting that they continue to follow the full curriculum and full course coverage.” (SLT - Senior leadership team)

“Keyworker children like mine were adversely affected to begin with as the pandemic struck. We didn't want to expose them to risk in keyworker childcare in school, but neither I nor my wife (both keyworkers) have been able to spend time 'home educating' our children, who were essentially left to get on with it at home, unlike the many families where the parents were at home furloughed.” (Parent or carer)

“Some A level students have had to seek extra employment to support the family finances which could have a considerable impact on their progress and achievement.” (Teacher - responding in a personal capacity)

“Those who have operated as young carers have not been able to devote time to remote learning. This affects girls disproportionately.” (Teacher - responding in a personal capacity)

“Students whose parents are not native and/or competent English language speakers will have struggled immensely at home, as they would be home schooling younger siblings.” (Teacher - responding in a personal capacity)

“So many young people have been forced to take on childcare for younger siblings as parents have continued to work but schools and nurseries have closed.” (Teacher - responding in a personal capacity)

Some respondents were concerned that independent schools and colleges were more likely to have offered a remote teacher-led provision than state schools and colleges.

“The independent sector has almost continued with a ‘business as usual approach’. Here, students with school allocated laptops have been able to ‘attend’ online sessions daily. In contrast, many students in the state system have engaged with very little or no home learning whatsoever. This hugely disadvantages these students.” (Teacher - responding in a personal capacity)

“Disparity between the quality of teaching during the pandemic between state schools and those in the private sector - how can someone with no effective teaching since March at a state school compete against students in the private sector whose timetables have largely remained unchanged save that the course content is delivered by Zoom or using Microsoft Teams. Yet they will be competing for the same university places.” (Parent or carer)

“Private schools and schools with more money and resources have had lessons throughout the lockdown as normal, whereas other schools haven’t been able to do any. This puts this year’s cohort at skewed advantages/disadvantages, solely based on our parents’ income or the place that we live. It has no reflection on how hard we work if we’re placed at completely different starting points.” (Student)

A number of respondents identified that disadvantaged students have been less able to accumulate wider knowledge and cultural capital during the coronavirus (COVID-19) pandemic.

“Subjects which do not have a KS3 [key stage 3] rely on students having real world experiences e.g. having access to a good quality newspaper and watching the news would positively affect students’ business & economics exam results. I have found (in 17 years of teaching in Bradford) that the PP [Pupil Premium] students have much less of this expected bank of knowledge. These are the students who will find completing the exam with less than the GLH [guided learning hours] much more difficult.” (School or college)

“With regard to MFL [modern foreign languages], many school trips had to be cancelled, which would have been the first and only real experience of the country/language for a huge number of economically disadvantaged learners. This may well apply to other subjects (theatre trips, geography field trips) and disadvantages learners who do not otherwise have experiences of such places. Much of the curriculum automatically assumes wider knowledge that the learners don’t have.” (Teacher - responding in a personal capacity)

Some respondents suggested that boys may have progressed less well than girls since schools and colleges closed in March, though a smaller number suggested the opposite.

“Concern on impact on gender - experience finds that girls have engaged more with lockdown learning.” (Teacher - responding in a personal capacity)

“Girls have coped better under lockdown than boys. They have completed more work and communicated better with staff. Boys have tended to play lots of computer games.” (Teacher - responding in a personal capacity)

“I’ve found that girls have been able to adapt better to remote learning whilst boys have missed their teacher and classmate interactions to complete work tasks.” (Parent or carer)

“Boys are less self-motivated than girls and so have struggled with online home learning - this will impact their grades also.” (Parent or carer)

“Year 9/10 girls more negatively impacted by lockdown, often expected to teach younger siblings while parents work.” (Parent or carer)

“I wonder if girls have been more susceptible to stress during the recent period than boys have? In my experience girls tend to be more unsettled than boys when required to move on to new material before they feel they have a good grasp of the old material - it causes a sense of panic and loss of control.” (Teacher - responding in a personal capacity)

Respondents identified particular challenges experienced by students with SEND since the closure of schools and colleges in March.

“SEN students need additional support, are less independent and have higher levels of anxiety and they will be mostly greatly impacted upon by this current situation.” (SLT - Senior leadership team)

“Students with SEN who have severely been affected with the change in teaching setting, creating severe anxiety for them and disengagement.” (Teacher - responding in a personal capacity)

“Difficulty SEND students face with the self-organisation which is required to participate in home learning effectively and the impact this has on eventual results. I fear that is not effectively mitigated by the accommodations considered in this review.” (Parent or carer)

“Dyslexic students are at an extra disadvantage as during lockdown some schools have simply sent worksheets and PowerPoint presentations. No live lessons were available. This is an impossible way to learn for dyslexic children and has made them demotivated and has turned them off learning. They are now even further behind their peers.” (Parent or carer)

“Deaf and hard of hearing students may have not been able to participate or struggled in online video call lessons e.g., Teams, Zoom.” (Student)

“Pupils with vision impairment may not have had equal access to learning during the pandemic, accessible formats or the ability to use their specialist equipment at home when schools closed.” (Other representative or interest group)

“Our cohort of students with complex physical disabilities have been disproportionately disadvantaged by COVID and remote learning. This is due to their care needs and their need for specialist support, often 1:1 support, to access their learning. [...] They are physically unable to be independent in their learning while at home in the way a student without complex physical disabilities is.” (School or college)

“My daughter is autistic. Lockdown has been a massive challenge for her, it has triggered autistic meltdowns and shutdowns. In reality she has been unable to concentrate on any academic work. Many students with autistic spectrum disorders, ADHD, anxiety related disorders, specific learning needs will all be in a similar boat. Autistic students will need significant time readjusting to a new normality.” (Parent or carer)

Respondents expressed concern about how SEND students may fare when schools and colleges reopen from September.

“SEND children need longer to overlearn information. Ramming through a very over heavy curriculum in less time than usual is going to have an even more negative impact on their ability to demonstrate their knowledge and skills.” (Parent or carer)

“Students with vision impairment need to experience practical work first-hand in order to understand what is happening and will be disadvantaged by simply observing it. They may not be able to see what is happening in a demonstration and verbal explanation is often a poor substitute for hands on experience.” (Other representative or interest group)

“My daughter has dyslexia. She was already going to be stretched by the GCSE exams but cramming all content in the last year will be disastrous for her. She needs time to learn and remember information. She will be completely overwhelmed.” (Parent or carer)

“Students with learning difficulties will be disadvantaged by a scheme where they will be asked to cram in another 1-2 hrs per day. Particularly students who have problems with memory processing, who need the time to digest what they learn, cannot just keep going with extra-long days or Saturday interventions. Their brains really need time to process.” (Parent or carer)

“No consideration is given specifically to M.E. chronic fatigue pupils, who are continually challenged in pacing their energy levels to complete normal exams (with added extra time already incorporated into their exams). [...] Increasing lesson time or intensity of content will have a significant negative impact on these children.” (Parent or carer)

“Students with SEND backgrounds have high needs in terms of examination practice and technique, which they have missed from not being in school and it will be extremely difficult to catch students up sufficiently with this.” (Teacher - responding in a personal capacity)

“Students with mental health and SEND issues are going to struggle with ongoing changes to the working environment, etc. that COVID-19 may generate. i.e. changes to routines, etc. They will find it harder to work this year.” (Other)

“The long-term impact of this on those with autism - change is difficult and can take a term or two for them to readjust to the new environment. For those in the current year 10, they might not recover from the changes in time for their examinations.” (Teacher - responding in a personal capacity)

Respondents also raised the concern that the loss of time in schools and colleges may mean that some students miss out on the reasonable adjustments they require.

“Some schools may feel that they have had little or no opportunity to collect evidence of normal ways of working for students with SEND in this school year, which will impact on their ability to both identify students who need access arrangements and provide evidence for evidence files. Students have also not taken mock exams in year 10. For some students, their issues with completing work in the time allowed only becomes apparent when they attempt whole exam papers. For others, issues such as handwriting becoming illegible after writing for an extended period only becomes apparent after taking whole exam papers. Despite JCQ's efforts to reduce the burden of organising access arrangements on school staff, the autumn term 2020 is going to be extremely challenging for SENCOs and others who are trying to ensure that students have their access arrangements in place in a timely fashion.” (Consultant)

“Pupils who have developed special educational needs as a result of COVID-19 (e.g. trauma induced anxiety) may not be in receipt of an EHCP [Education, Health and Care Plan] or formal diagnosis within the timeframe for access arrangements.” (Local authority)

A number of respondents noted the impact of the coronavirus (COVID-19) pandemic on some students' mental health, and the consequent impact on their learning.

“Students who had mental health problems before COVID-19 and have struggled immensely. They will continue to struggle with the uncertainty and with the pressure being placed on them to catch up and perform well. There will also be more students with anxiety as a result of the pandemic. This could lead to students refusing to go to school or not concentrating in class because they are worried about the surroundings.” (Teacher - responding in a personal capacity)

“I think you should consider the impact that the coronavirus has had on students' mental health especially those with pre-existing mental health conditions. In this climate of uncertainty and tragedy it has been difficult for me and many people I know to find the motivation to pick up a textbook. This is compounded by the fact that we haven't the usual help and guidance from our teachers.” (Student)

“My year 12 daughter is normally high achieving. She has a laptop and is not part of a minority group. Yet her grades have gone from A to D over lockdown. Not one incident of face to face contact with her 6th form college. She is struggling massively with her mental health and I can see she will become a hidden casualty. I am devastated for her and all those like her.” (Parent or carer)

“I do not see much in the way of appreciating the mental health impact that fear of COVID-19 has had, nor the loss of friendships, structure, routine and opportunity to get out. This has led to some real issues in my Year 10 year group and they are going to take time to be back to full functionality next academic year. It appears to me that there is an assumption that with effect from September, students will just go back into school as if they had had a summer holiday. This is not the case.” (Teacher - responding in a personal capacity)

A number of respondents expressed the view that the proposed 2021 exams would harm students' mental health.

"Students with these conditions will be put under additional pressure with a full curriculum exam however they missed a term of study. Harmful, stressful position to put these kids in." (Teacher - responding in a personal capacity)

"I strongly believe that putting these children through the normal exam routes in these unprecedented times will create significant mental health issues as they struggle to meet expectations for which they have not been adequately prepared." (Other)

"I am extremely concerned about the mental health of students sitting exams in 2021 - my son and many other students I know are already extremely concerned and stressed about catching up on months of lost learning and teaching and how they are going to be able to learn all the relevant information in detail for their exams." (Parent or carer)

Respondents identified particular impacts on students according to their ethnicity, including the disproportionate impact of the coronavirus (COVID-19) on some Black, Asian and Minority Ethnic (BAME) communities and recent developments relating to the Black Lives Matter movement.

"We know COVID-19 has disproportionately hit BAME communities. These children will be suffering bereavements, increased stress and fear of illness, not to mention the effects of the killing of George Floyd adding to stress levels. How will this be considered in changing exams?" (Other)

"Black Lives Matter movement may have affected students emotionally over period of online lessons, making it harder to stay focused etc." (Student)

"BAME students are most affected by the virus. All students in my class are black or Asian. I am concerned about their welfare and how learning in school will affect their health and their families' health." (Teacher - responding in a personal capacity)

"BAME students less likely to access support at college due to worries about contracting COVID or taking it home to multigenerational households." (Teacher - responding in a personal capacity)

"Some minority ethnic communities are particularly susceptible to COVID-19 infection and are more likely to experience more pronounced effects. There is therefore a risk of greater disruption on the educational experience of students living in minority communities, particularly given the Government's stated preference for a policy of localised lockdowns in communities where there are surges in the infection rate." (Other representative or interest group)

Respondents also noted that medically vulnerable students – or students living with medically vulnerable relatives – may also have their learning impacted.

"My son is classed as clinically vulnerable and was not allowed in school for the face-to-face teaching that was offered for four weeks during June/July 2020. He missed out on eight hours teaching per A level subject through no fault of his own." (Parent or carer)

"Being extremely medically vulnerable I have already lost out on a large proportion of my education and already feel disadvantaged in line with my

peers, the catch up sessions with my teachers have not been able to take place and through no fault of my own I will not receive exam grades that are a true reflection of my academic ability. This has impacted on my mental wellbeing and this continues to be a very stressful time for me. I was told by my consultant I could only attend school if social distancing was in place.” (Student)

“My mother and brother have been shielding throughout school closures and I therefore did not return to school at all. I have missed 3 months of content because I had household members shielding. It was not what I wanted to do, but it was what I had to do to keep my family safe. I and others in my position will be at a severe disadvantage.” (Student)

“My daughter is a young carer for me and since I'm extremely clinically vulnerable she is suffering with anxiety about going back to school. [...] Plus of course if there is more requirement for people shielding to lock down then she wouldn't be able to go to school - how will that be taken into account?” (Parent or carer)

“Not all students may be able to complete the citizenship action project or other coursework projects if they have to shield, become ill.” (SLT - Senior leadership team)

“Children who are shielding and vulnerable may not return to school at all. Can schools reduce the number of options they can be entered for?” (School or college)

Respondents identified a particular impact arising from the closure of schools and colleges on students for whom English is an Additional Language (EAL students).

“EAL students need extra time & support to meet current pass standards now, with 6 months where they will have mostly spoken their home language, catching up (in particular) literature texts will be astonishingly difficult.” (Teacher - responding in a personal capacity)

“I teach largely EAL students in a very deprived area. They already have significant hurdles to overcome to achieve in English, from developing spoken and written skills, to plugging significant gaps in terms of cultural capital. [...] Losing two terms of learning for students who often begin secondary 3 or more years below where they are expected to be is not something that can be easily remedied and the pretence that it is possible to just go to 'business as usual' and these pupils will be fine is, frankly, insulting.” (Teacher - responding in a personal capacity)

“Many students who speak English as an additional language will have been disproportionately affected by the school closures, especially those who are relatively new to English. Many will have had limited exposure to standard English and, consequently, will not make the expected progress in their English language proficiency. These young people have an additional challenge in learning the academic language required for examinations. As exam coverage has not been reduced in most subjects, EAL speakers may have a greater challenge to both catch-up and cover the syllabus to the same level as fluent English speakers.” (Local authority)

Respondents also noted that some students' learning may be impacted by potential regional restrictions from September.

“With the possibility of further localised closures such as Leicester, there will be additional periods of home learning for students around the country. This means they will not be back in the classroom full time from September like their counterparts around the UK, meaning they would undertake online learning or self-teaching. This is a huge inequality with regards to the availability of technology and the quality of work given, if any.” (Teacher - responding in a personal capacity)

“The impact of local lockdowns, especially as it seems they are more likely to occur in disadvantaged areas.” (Teacher - responding in a personal capacity)

### **Subject by subject**

Respondents identified disparate impacts on students depending on the subjects they are taking.

“The adjustments that have been made to the history course are much more significant than those made to geography, in terms of the amount of content removed. This unfairly disadvantages students who chose geography.” (Teacher - responding in a personal capacity)

“The plan to have content sampling in just three subjects advantages those students taking those subjects, including ancient history, which is disproportionately studied in private schools that haven't suffered the same disruption as state schools. History and geography are EBacc [English Baccalaureate] subjects, less likely to be studied by socio-economically disadvantaged students. I agree that there should be content sampling in these subjects, but this should also be extended to English literature, a near-universal subject. In general, lack of content sampling in English literature is likely to disproportionately affect state school students, who are more likely to have fallen behind during school closure.” (Teacher - responding in a personal capacity)

“Ethnicity balance: ethnic minorities are more likely to take minority subjects such as social sciences. This means not making changes to them compared to others is going to be an issue.” (Teacher - responding in a personal capacity)

“You are placing those subjects typically favoured by lower ability students (like citizenship) at a disadvantage to those in the EBacc (history and geography) by insisting that their course remains the same, whilst the others have had entire sections taken out.” (Teacher - responding in a personal capacity)

“The disparity between (lack of) changes to RS [religious studies] and the other two Humanities is a concern. As RS is often taken as a core subject in faith schools, this could arguably put pupils in faith schools at a disadvantage.” (Teacher - responding in a personal capacity)

### **A level students**

With fewer amendments proposed for A levels, respondents noted an impact on A level students.

“The sweeping generalisation made that A level students have been better able to cope with independent learning is patently false for many individuals, be it due to limited access to technology and home support or trauma and mental health difficulties.” (SLT - Senior leadership team)

“You can't simply ignore A level students, and say they are more 'motivated'. That's just ignoring us. A levels are 10 x harder to teach yourself than GCSEs, and we've missed 4 months.” (Student)

“The assumptions made about A level students compared to GCSE students (i.e. they are more motivated to study subjects selected and should be better independent learners) does not appear to me to take into account SEN students or students with mental health issues who have been significantly affected by remote learning but are considered to require fewer adaptations to the exams because 'they are older'.” (Teacher - responding in a personal capacity)

## **Practical work**

Respondents noted that schools and colleges may find it challenging to deliver practical teaching from September, with some schools and colleges potentially finding it more challenging than others.

“If some students are unable to demonstrate practical skills in schools due to public health restrictions but other students are able to, based on school resources, number of teaching and support staff, room sizes etc. inequalities will arise.” (Teacher - responding in a personal capacity)

“There are safety concerns re COVID-19 about carrying out practical work at all. This is particularly true in state schools which have less equipment and less space.” (Teacher - responding in a personal capacity)

“Schools with larger number of pupils may not allow practical activities to resume as quickly as others in order to maintain 'bubbles'.” (School or college)

“For sciences, there will be significant equality impacts in terms of being able to complete some practical work at A level - some schools will have sufficient equipment, technician support and lab space to allow complex practicals to be completed individually, with allowances made for social distancing and hygiene. Others will not - and so students will have far fewer opportunities to complete practical work - reducing the likelihood of a practical endorsement pass.” (Teacher - responding in a personal capacity)

“Colleges with no sports facilities in inner city areas totally rely on external facilities opening in order to gain video footage. At the minute this is therefore not possible. The students also rely heavily on public transport to attend clubs/games etc. all of which is putting them at risk in order to collect video footage.” (Teacher - responding in a personal capacity)

“Some school art rooms are not possible for all pupils to face the front. It is difficult to teach art from the front of the room and not get closer than 2m to pupils. Some schools may have to move to non-specialist classrooms.” (Teacher - responding in a personal capacity)

“I strongly disagree with digital/photographic portfolio moderation for art & design. It would put some centres without the appropriate photographic & digital facilities at a disadvantage and could be an opportunity for those with access to digital editing to present work to look better than it actually is.” (Teacher - responding in a personal capacity)

Some raised concerns about the proposed flexibility for physical education assessments.

“Activities that students are able to access are very different based on their socioeconomic background and environment. Limiting to individual only (if team sports are delayed) will only advantage those with access to golf/swimming/cycling/rowing facilities.” (Teacher - responding in a personal capacity)

“Many of the individual sports are not accessible to inner city students, with cost and facility limitations. Inner city students take part in team sports due to lower costs and access to facilities.” (SLT - Senior leadership team)

“Some ethnic groups perhaps would see cricket as their national game and is their forte. The loss of any form of cricket being filmed removes this as an opportunity to submit marks for their best activity.” (Teacher - responding in a personal capacity)

“Those playing disability sport may be withdrawn from activity for a sustained period of time. For example, those involved in disability cricket are not yet able to return following the guidance of the ECB [England and Wales Cricket Board], for those at disability clubs and county sides are disadvantaged further. This is one example as NGBs [national governing bodies] try to protect these potentially more vulnerable participants.” (School or college)

“At present there is a clear gap on men’s sport returning to normal whilst women’s sport is still on hold. This could put girls studying GCSE & A level PE at a disadvantage to boys.” (Exams officer or manager)

Respondents commented that our proposals to permit flexibility in some of the practical elements of GCSEs, AS and A levels for 2021 would have an impact on students who prefer these practical elements. This may particularly impact particular student groups.

“The limitations on practical aspects of assessment and curriculum delivery are likely to disadvantage disproportionately neurodiverse learners, and especially students with SEND who rely more heavily on such experiences as a means of developing and cementing their understanding and insight into key assessment elements.” (School or college)

“The policy of protecting content over skills risks disadvantaging those pupils who respond to active/experiential learning styles. Research identifies that boys are disproportionately represented in that group. Hence we would recommend an equality impact assessment of the proposals in regard to gender.” (Other representative or interest group)

“Students with dyslexia and working memory issues may be disadvantaged by taking out practical elements of courses and having to rely on memory to perform in exams only.” (Parent or carer)

“Removal of the speaking requirement at GCSE MFL will lower the outcome grades of native speakers, certain SEND candidates such as dyslexics and others who perform better in speaking than in written tasks.” (Teacher - responding in a personal capacity)

“Students in deprived areas as such as the one where I work really benefit from doing the [MFL] speaking exam and being able to put their skills to practise. They perform better in this skill than in listening and reading which relies more on their vocabulary in English and literacy skills, removing the speaking will widen the gap.” (Teacher - responding in a personal capacity)

“Pupils with low literacy levels and EAL usually achieve highest on [MFL] speaking exams. For example, we often have in year arrivals from Italy, Portugal etc. who struggle with the writing element but feel a great sense of pride in managing a speaking exam in a foreign language.” (Consultant)

“The [MFL] speaking exam favours our boys more in a subject dominated by women.” (Teacher - responding in a personal capacity)

### **Two-year GCSE**

Respondents noted that the closure of schools and colleges may have a greater impact on schools and colleges who deliver GCSEs over two years as opposed to three.

“Prior to this crisis the GCSE content has been heavily criticised for its breadth and schools who teach in the two years struggle to cover it. Schools who teach GCSE over three years have a massive advantage over those that teach it over two years. This is hugely discriminatory.” (Teacher - responding in a personal capacity)

### **Impacts on the cohort as a whole**

In addition to impacts on particular groups of students, respondents identified particular impacts on the 2021 cohort as a whole, relative to other cohorts.

“These children are not equal to other children. They have had the pressure of 2021 exams hanging over them throughout the pandemic knowing they are not receiving the teaching they deserve. They are impaired and vulnerable.” (Parent or carer)

“Understanding that these students are under the age of 16 and we are expecting them to conduct independent, self-motivated learning which they would not do until they reach higher education.” (Awarding organisation employee)

“An online class is not a virtual equivalent of a classroom as it is much less productive and comes with several problems such as connectivity issues and a lack of a whiteboard etc.” (Student)

“There are likely to be many students from middle or even high-income households, who may be facing economic uncertainty/hardship for the first time in their lives.” (Teacher - responding in a personal capacity)

“Some may have been bereaved due to COVID-19.” (Teacher - responding in a personal capacity)

“There is a great possibility of many students experiencing burnout in the coming year. Whilst it is essential to focus on students who have achieved little to nothing over the past few months, there will comparatively be a huge amount of students who have done all too much work, because the pressure, stress and amount of time they have at home has allowed many students to over-work.” (Student)

“Whilst there will be an acknowledgment for pupils this year [2020] that exams did not take place, the same will not be said for next year’s cohort who are expected to take exams following significant disruption, lost and inconsistent learning and an uncertainty as to how school will look in Sept 2020.” (Parent or carer)

“Although we will endeavour to give students the same amount of teaching and learning time as previous years have had, the logistical implications of large bubbles, additional hygiene measures and staggered days means that inevitably teaching time will be lost. This will impact on the depth and breadth of knowledge gained.” (Teacher - responding in a personal capacity)

“From September, we are socially distancing which means that students are not getting individualised help and guidance. We cannot mark work immediately, so students are going to be heavily disadvantaged.” (Teacher - responding in a personal capacity)

“Mental wellbeing for students - too much to do - some will not overcome the mountain of work and may just leave education - knock on effect to unemployment/skills/economy and universities.” (SLT - Senior leadership team)

“While all staff will work hard to catch them up, it is almost a certainty that for a few weeks the emotional and mental wellbeing of the students will need to take priority.” (Teacher - responding in a personal capacity)

“It seems somewhat inequitable that the year 11 cohort of 2020/2021 has missed more weeks of schooling than this year’s [2020’s] cohort who had essentially completed the course and were revising at the point of lockdown, to face a virtually unchanged examination regimen with no element of teacher judgement.” (SLT - Senior leadership team)

“I don’t understand how we are being made to complete our exams with no consideration put in place. The year above had all their learning yet got to skip exams yet year 12 and 10 are expected to complete exams as if nothing has happened? It doesn’t make sense at all. It is simply unfair and ignorant to believe we have the learning to complete exams in the same conditions as all previous years.” (Student)

“Students’ knowledge and skills will not compare to past cohorts. They will be at a disadvantage unless some content is removed or becomes optional during exams.” (Teacher - responding in a personal capacity)

“This year’s [2020’s] A level students have not sat exams and are being given [calculated] grades. [...] Many of this year’s students will defer places until next year due to COVID-19. This then means that students taking A levels in 2021 will be competing against this year’s students. If A level students of 2021 are not given any allowances and get lower grades, due to missing tuition on

a lot of subjects, this is totally unfair as they will miss out to students who have been given [calculated] grades this year.” (Parent or carer)

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

We received 11,264 comments in response.

### **Support for students and centres**

Respondents suggested that there should be a range of targeted provision to allow students to recover following the closure of schools and colleges and progress with their learning.

“If schools had the capacity to be able to support the most vulnerable groups by being able to provide them with access to resources, not just books, but tutoring, laptops etc. to support their studies at home this would create a more equal chance for those potentially disadvantaged.” (SLT - Senior leadership team)

“If 'blended learning' is used all students need access to IT and reliable broadband signal.” (Teacher - responding in a personal capacity)

“Access to texts outside the school. Many students cannot afford copies of texts or have internet access to them. All GCSE texts should be freely available online, off school site - perhaps through exam boards, or a DfE site. This will help students continue to refer to them as part of revision, and to help reduce teaching time spent on recapping books, etc. Schools cannot afford to supply individual copies to students when they are often lost or misplaced and teaching 2 GCSE groups (y10 and y11) at the same time.” (Teacher - responding in a personal capacity)

“The impact of buying ingredients for lower income families. Extra funding needed for these students in both DT [design and technology] and food preparation and nutrition.” (Teacher - responding in a personal capacity)

“If pupils are accessing learning from their home, materials need to be provided in accessible formats, ensuring that specialist equipment is available at home as well. Videos need to have audio description when being used as part of learning materials so as to ensure vision impaired children are able to participate.” (Other representative or interest group)

“Extra lessons as school days are made longer. Staff to be paid more to teach these lessons, rather than unchecked tutors. The teachers will know best what has been missed from their syllabus.” (Teacher - responding in a personal capacity)

“I would expect tutoring/intervention to targeted at disadvantaged and disengaged students of all ethnic backgrounds. This should not be out of school time or part of an extended school day; disengaged students are not likely to engage in staying in school longer!” (SLT - Senior leadership team)

“In order for schools, the Department for Education, Ofsted and Ofqual to meet its Public Sector Equality Duty in respect of GRT [Gypsy, Roma and Irish Traveller] – i.e. to enable GRT participation in public life, to foster good

relations and eliminate discrimination - pupils and students from these communities should receive targeted support in the coming academic year to ensure they get their qualifications.” (Other representative or interest group)

“Is it possible for exam boards to offer summer webinars/revision of content for candidates from all backgrounds to attend free.” (Teacher - responding in a personal capacity)

“Instrumental lessons paid for students who haven't had the ability to practise an instrument at home during this time (and have therefore regressed).” (Teacher - responding in a personal capacity)

“More money for schools with high numbers of FSM [free school meals] students. These already disadvantaged students need the extra support.” (Teacher - responding in a personal capacity)

“ADHD, dyslexia, autism and learning difficulties all exist in mainstream educational settings and do not receive in some cases the support they require to succeed. Additional support and measures must be implemented for those students.” (Parent or carer)

“Relaxation of S42 of the Children and Families Act is impacting on pupils with EHCPs. The relaxation must end as soon as possible and should not be reactivated again during the next academic year. Pupils must be able to easily have their review or appeal around their EHCPs to ensure that they meet their needs and are able to partake in their exams fully with the right support in place.” (Other representative or interest group)

“More mental health counselling for students to help them deal with stress and pressure of exams after an extended time away from school where they may have also suffered bereavement or financial stress.” (Teacher - responding in a personal capacity)

## **Subjects**

Respondents suggested that comparable adjustments should be made to all subjects, not just higher-entry subjects.

“Make sure ALL subjects are treated equally - please do not downgrade options over core subjects.” (Teacher - responding in a personal capacity)

“Changes made to other subjects in light of equality must be made to all subjects, so if content is reduced in history, then it must also be reduced in classical civilisation. If changes are made to only a few courses, then the courses that don't see change will not be taken up by students.” (Examiner)

A number of respondents suggested that negative impacts could be mitigated if students were able to drop one or more subjects.

“Some students will only need 5 GCSEs to move on to their chosen next stage. To force them to try to complete 8+ will seriously disadvantage them. Currently schools will be penalised if these students are allowed to drop exams.” (Teacher - responding in a personal capacity)

“Removing the double weighting influence of English literature in order that vulnerable students are not encouraged to sit both [English] exams in order to secure P8 [Progress 8] points.” (Teacher - responding in a personal capacity)

“Progress 8 scores and league tables should be suspended for the 2021 exam results. This will allow schools to provide disadvantaged students with more flexibility in the subjects they are examined in, without impacting on the school’s outcomes.” (Teacher - responding in a personal capacity)

“I have an EHCP. My learning will suffer more than most. I would like to drop subjects and concentrate on passing the most important ones.” (Student)

### **Tiering and alternative assessments**

A number of respondents suggested that there could be more tiering in the 2021 exams.

“Introduce a foundation level English paper with fewer books and less poetry to help those who struggle with this already and will have been impacted the most through one to one support in school during lockdown.” (SLT - Senior leadership team)

“I am very concerned for those students who have struggled to complete any work in lockdown. A foundation option in history for these students would be a possible solution. This would require them to demonstrate less specific subject knowledge.” (Teacher - responding in a personal capacity)

“Is there any way that, particularly in MFL, we could have mixed tier choices again so that pupils who are strong in reading could do the higher tier paper and foundation tier in the papers they are weaker at. As they will all have gaps it would make sense for them to feel confident about a paper they have strengths in.” (Teacher - responding in a personal capacity)

There was also the suggestion that some students could take different assessments or take assessments in a different format.

“Have a separate exam for students with SEND/disadvantaged students/low ability students.” (Teacher - responding in a personal capacity)

“EAL students should be given different papers, simpler questions.” (Teacher - responding in a personal capacity)

“Will there be any consideration for a remote exam for those learners with health complications or have been shielding. Some adult learners have additional issues regarding this and may not want to be in rooms with large numbers of others.” (School or college)

“Have a backup plan for exams to be taken online, should we have school closures at exam times. Allow individuals with coronavirus to take the exam online.” (Teacher - responding in a personal capacity)

“Our students live in different locations and say travel from Leeds to Manchester. Could oral exams be done by video conference?” (Awarding organisation employee)

Alternatively, a small number of respondents suggested that all students should take the same exams.

“There should be no F/H [foundation/higher] division so that pupils performing at the threshold between the two do not miss out on possibly achieving a higher grade.” (Teacher - responding in a personal capacity)

## Accessible and inclusive assessments

A number of respondents suggested that exam boards should ensure that the 2021 assessments are accessible and inclusive, so that students are not prevented from demonstrating what they know and can do.

“The demands of questions ought to be explicit within the question or examples.” (SLT - Senior leadership team)

“Questions should be phrased at a suitable reading age for all and question stems and terminology should be clear for all. In previous exams some questions have thrown the low literacy students and teachers will naturally give synonyms when talking through questions face to face. An accessible question would not limit a more academic response either.” (Teacher - responding in a personal capacity)

“EAL students who have been in homes where English is not spoken will potentially have regressed; the language and wording on the 2021 papers needs to be as simple as possible to allow for the testing of subject specific understanding and not primarily a test of English comprehension.” (Teacher - responding in a personal capacity)

“Maths exams should focus purely on maths. Fewer context driven questions and fewer words. This will allow all students to demonstrate their mathematical ability without being disadvantaged due to other factors.” (Teacher - responding in a personal capacity)

“If possible, provide a glossary for some difficult terms.” (School or college)

“[MFL] questions set in the target language for writing often cause some students to struggle to access what is required. These could be put into English to afford greater accessibility.” (Teacher - responding in a personal capacity)

“[In MFL] remove those 'little words' and distractors from reading and listening. At a time where we should build students' confidence, we should not be asking for them to look out for deliberate traps and tricks where they will be caught out.” (Teacher - responding in a personal capacity)

“More scaffolding is needed in examinations. The very language of questions on the papers is difficult to access for some candidates, since apart from science, MFL and maths, questions are written to enable top candidates to achieve Grade 9, sometimes at the expense of our weaker candidates? Has anyone ever age-assessed the range of questions on GCSE papers, or looked at all the different meanings of key verbs, dependent on subject?” (Teacher - responding in a personal capacity)

“I teach at a school with over 50% FSM. The current exam set up already disenfranchises them and there are already issues with exclusivity and lack of access. Such as assumptions made about students' cultural capital, questions that advantaged middle class students, such as a language text [...] being about 'down-sizing'. [...] 'Down-sizing' is a middle-class concept that so many of the brightest students couldn't access.” (Teacher - responding in a personal capacity)

“Contexts for questions are relatable (e.g. not "listening to a play on the radio" or "going to the local deli to buy croissants") to the experience of students from all backgrounds not just middle class. Take into account that not all students travel abroad on holiday or have access to media.” (Teacher - responding in a personal capacity)

“Be mindful of what questions go into exam papers in 2021. Some students may well have lost member(s) of their family and not have processed this. So, having questions based around death from infections may lead to those feelings being triggered and lead to loss of focus and lower exam performance.” (SLT - Senior leadership team)

“Ensuring questions on the examinations are ones that BAME students can relate to would ensure that these students can succeed and help to mitigate any stress or sense of isolation and segregation from our community that is felt and exacerbated by the coronavirus.” (Teacher - responding in a personal capacity)

### **Reasonable adjustments and special consideration**

A number of respondents suggested that there could be more reasonable adjustments and special consideration available to students taking exams in 2021.

“SEN students have been particularly negatively impacted by this situation. Perhaps increasing the extra time that many of them are entitled to in exams (and allowing more students with defined SEN to access this) would help to mitigate the negative impact of school closure.” (SLT - Senior leadership team)

“Automatic extra time for disadvantaged students.” (Teacher - responding in a personal capacity)

“I believe that SEN students and EAL students will have suffered the most during this time, as they will not have been able to receive the standard of support they require in order to access the GCSE specifications and therefore perform well in their GCSEs. Therefore, these students could be given extra time and a reader within their exams even if their requirements would ordinarily suggest they don't require it.” (Teacher - responding in a personal capacity)

“Increase access arrangements to include students that have proven mental health issues or ongoing emotional difficulties as a direct result of COVID-19.” (Teacher - responding in a personal capacity)

“The consideration of allowances for EAL students - students are allowed a dictionary depending on the amount of time they have spent in the country. Having missed out on English Language education since March, this time limit should be adjusted to support those who have missed out on these vital weeks and months of language acquisition.” (Teacher - responding in a personal capacity)

“Some of my students have asked that it be made simpler to have the option of typing their exams. Because of the remote learning many have become used to typing all of their work as opposed to handwriting and would welcome the inclusion of the automatic right to type their exams rather than having to

go through the school SENCO to get permission to do so.” (SLT - Senior leadership team)

“Extend deadline for some access arrangements as schools may not have had time to complete the assessments.” (Teacher - responding in a personal capacity)

“Special consideration possibilities and procedures for schools and localities impacted by local lockdowns and/or self-isolations during the academic year that may impact quality of preparation for exams and coursework. [...] Consideration of special consideration for students impacted by bereavement (within their families and/or school) during their exam year.” (SLT - Senior leadership team)

“Does a broader spectrum of special considerations need to be considered for students’ mental health and well-being and may have struggled particularly during this time?” (Teacher - responding in a personal capacity)

“Could we extend the usual approach of taking different circumstances into account (e.g. illnesses, family deaths etc.) so that it extends to students that we know have had problems accessing work outside of school due to their living conditions or resources they have available to them?” (Teacher - responding in a personal capacity)

“We suggest that Ofqual and the exam boards consider the likelihood of the increased need for special consideration next year, and how this can be managed most appropriately for students and families that may not be experienced in navigating the exam system, or may not have the language skills needed to do so.” (Other representative or interest group)

It was also suggested that any modified assessment requirements for 2021 should be considered in light of the resultant impacts on students with reasonable adjustments.

“Any possible changes need to take into consideration the impact that they may have on those students that require specific assess arrangements. These changes need to ensure that these students are not put at a disadvantage.” (Exams officer or manager)

### **Marking and awarding**

Respondents suggested that students’ circumstances should be taken into account at the marking and awarding stages.

“On the art/craft/design courses there is an expectation to cover two areas of study - but many students haven't had the time to develop skills in two areas of art - such as clay and painting - so maybe have less expectation for seeing a wide range of media in their coursework.” (Teacher - responding in a personal capacity)

“For practical subjects, students’ practical ability would have taken a hit as they would not have participated in dance/drama classes to improve their skills. Therefore, grade boundaries may need to be looked at to take into consideration this. Also dance classes may not be able to go ahead in September so it'll be more time students cannot improve their technical skills.

This should be taken into consideration when marking the practical NEA examinations.” (Teacher - responding in a personal capacity)

“All that data collected over the last 10 years or so should be used. For example, if White disadvantaged boys do 5% worse in 2021 than they normally do on average, then they could just be awarded 5% extra. If the gap between private schools and comprehensive schools is larger than normal, then that could be levelled using data.” (Teacher - responding in a personal capacity)

“Ensure that the grades given are proportionally equal to 2019 and before.” (Teacher - responding in a personal capacity)

“Lower the grade boundaries for A levels next academic year as applying to university for 2021 is going to be very competitive as many of the 2020 A level students have decided to transfer to university in 2021 due to COVID-19 restrictions, and they have been awarded their predicted grades which are most likely better than what they would have been awarded from doing an A level exam in stressful timed conditions.” (Student)

“The amount of lost teaching time could be accounted for in different regions with different grade boundaries.” (Teacher - responding in a personal capacity)

### **Receiving institutions**

A number of respondents suggested that negative impacts could be mitigated if receiving institutions take a sympathetic approach to the 2021 cohort.

“Assurance and action from Higher Education and Apprenticeships providers etc. that the criteria for admittance will be made more flexible.” (Parent or carer)

“Ask universities to lower grade requirements or make offers unconditional based on Predicted Grade from GCSE or Most Likely Grades.” (Parent or carer)

“This should be taken into account by universities - potentially encouraging more contextual offers based on how good your school has been during COVID.” (Student - private, home-educated of any age)

“Universities requiring higher grades will need to filter the students in other ways - online interview or aptitude tasks. Discrimination training for admissions tutors and cash advantages to universities and students from lower income backgrounds (by POLAR [participation of local areas] wards rather than Pupil Premium).” (Teacher - responding in a personal capacity)

### **Clarity as soon as possible**

Respondents expressed a wish for clarity about the assessment requirements for 2021 as soon as possible.

“Making the decision as early as possible will ensure preparations can be made by teachers and the subject community to mitigate the potential negative impacts.” (Teacher - responding in a personal capacity)

“More details of the exact structure of exams as soon as possible to allow students (especially those with mental health issues) to understand exactly

what is expected of them and prepare accordingly.” (Teacher - responding in a personal capacity)

Respondents also emphasised that it would be useful for centres to receive guidance to help them prepare students for the 2021 assessments.

“[We] would urge exam boards to provide additional guidance and teaching resources to their centres, to ensure that burden on teacher planning is not increased by requiring teachers to seek out new simulation resources or create their own recorded demonstrations.” (Other representative or interest group)

“Publish clear, specific guidance on how to tackle practical work. E.g. tell us it is permitted for pupils to carry out practical work if they have gloves/equipment is not shared/is sanitised between uses etc.” (Teacher - responding in a personal capacity)

“I can't stress enough how important it would be for us to receive SAMs [sample assessment materials] for any modified papers WELL in advance of the 2021 summer exams. Students need time to develop exam technique and teachers also need to get their heads around them.” (Teacher - responding in a personal capacity)

“JCQ has been helpful in reducing the burden of standardised testing for such access arrangements as a reader. It would be very helpful if JCQ could make it very clear that they know that schools may have an incomplete picture of need for some students and so can apply the instructions set out for Form 8 Section 1 when little information about the student's background is available to paint a picture of need (page 89 of the 2019-2020 AARA). SENCOs are also likely to find it more difficult than usual to complete formal testing of students who need standardised test scores in order to gain permission for some 'higher risk' access arrangements. Advice on how to proceed if this is the case would be very welcome.” (Consultant)

“It would be useful to have some COVID specific arrangements or guidance on special considerations for the groups of students listed on page 44 [of the consultation document], and more flexibility in terms of what would warrant an exam centre making an application.” (School or college)

Respondents also suggested that contingency plans should be formulated and communicated in the event of the pandemic causing further disruption.

“These proposals do not sufficiently recognise and plan for likely further disruption to learning – we believe Ofqual should have gone much further. It must be more clearly acknowledged that the ongoing impact of the virus leading towards the 2021 series is unknown and that suitable contingency plans need to be ready alongside these proposals.” (Other representative or interest group)

“The short-term nature of these proposals concerns us. There is no indication of a contingency plan if there is ongoing disruption to education.” (Other representative or interest group)

“More generally we would urge Ofqual and DfE to begin developing a longer-term approach to managing effects of COVID-19 measures which might continue to be noticeable for years to come. Rather than just be looking to

address disruptions this academic year, we believe there needs to be a 3-5-year strategy for mitigations which can be phased down or adjusted over time.” (Other representative or interest group)

### **Reiterating views expressed elsewhere in the consultation**

Respondents also gave a range of other suggestions that echo views expressed elsewhere in this consultation.

For example, respondents suggested that negative impacts could be mitigated by reductions in subject content, or by centres receiving advance notice of which content would be sampled in the summer 2021 exams.

“We would argue that recognising the issues students have faced this year, giving advanced warning of a change to sampled content (not the content itself) would be an appropriate mechanism to address these issues in exceptional circumstances, that would still allow teachers and students to cover the breadth of the curriculum, while creating space and certainty for students in what areas they should focus on in the limited amount of time left in their studies.” (Other representative or interest group)

Responses also suggested optionality in exam papers (see question 1) however, a smaller number of respondents suggested that introducing optionality may have a negative impact on some students.

“If moving to optional questions in the exam paper, there will be a greater negative impact on those with SEND, potentially with them inadvertently failing to choose the 'right' question to answer in the first place but also using up valuable time making that choice and negatively impacting how many other questions they can successfully complete in the exam time.” (School or college)

Echoing views expressed elsewhere in the consultation, respondents suggested that negative impacts could be mitigated by either reducing or increasing the role of non-exam assessment.

“Coursework [...] could benefit [students with learning difficulties] as their final marks would then not rely solely on their performance at the exams, where they need to regurgitate information (which some of them really struggle with due to their learning disability).” (Parent or carer)

As elsewhere in this consultation, respondents suggested the grades awarded in 2021 could derive wholly or in part from centre assessment, with less emphasis on terminal exams.

“Some teacher input for 2021 grades - teachers could provide calculated grades that make up a % of the overall grade when combined with exam result. This way the teacher could use their knowledge of the student and their background to give a more realistic view.” (Teacher - responding in a personal capacity)

Respondents also reiterated that negative impacts could be mitigated if students are given access to relevant resources in the exams.

“Issuing them with formulae sheets and other resources that support them in exams.” (Teacher - responding in a personal capacity)

# Regulatory Impact Assessment

We set out in the consultation our analysis of the activities associated with changes to assessment arrangements and asked:

## **Are there additional activities associated with changing the exam and assessment arrangements for students taking the qualifications in summer 2021 that we have not identified above? What are they?**

We received 6,450 responses. Some commented on the activities we had identified in our regulatory impact assessment, and others highlighted additional activities associated with the delivery of the 2021 exam series. Many of the comments went beyond the proposed changes to assessment, focusing on catch-up arrangements and well-being more generally.

### **Timing of the 2021 exams**

Many respondents commented on the impacts of delaying the start of the 2021 exam series. These impacts are reported in the analysis of questions 7-12. Respondents' comments on expected costs arising from the proposal to delay the start of the 2021 exams are reported in the analysis of the question that asked about any additional costs that might be incurred if the proposals for 2021 are introduced.

### **Teaching and learning - catching up time missed**

Many respondents commented that considerable time and work would be needed for senior leaders and teaching staff in centres to familiarise themselves with the amended requirements, to train staff and to put in place revised teaching arrangements. Respondents expressed strong views that decisions and guidance would be needed as early as possible to enable arrangements to be put in place by the start of the autumn term. It was noted that this was in the context of teachers having had a heavy workload and little break since centres closed in March.

“School leaders and school staff have worked tirelessly over the past four months to entirely redesign educational provision in line with public health requirements. The proposals set out in this consultation will have significant workload implications for school leaders and their staff. It is likely that Ofqual's consultation decisions will be published either at the very end of the summer term or in the summer holidays. This will necessitate school leaders and teachers working over the summer holidays to adjust their curriculum, including their plans for non-exam assessment, in line with Ofqual's decisions, ready for the start of the autumn term.” (Other representative or interest group)

Many respondents commented that there will be a significant burden on teaching staff to provide additional teaching to ensure students catch up with content missed during the period that schools and colleges have been closed. Some expected that this would require out of hours teaching, including evenings, weekends and holidays, noting that teachers already have full timetables with little or no flexibility during school hours. A few also highlighted that it would take some time at the start of the new term for teachers and students to re-adjust to school life and settle in to new routines. Some respondents commented that additional teaching staff may be required to enable students to be taught in smaller groups, maintaining 'bubbles', in

line with public health guidance. A few commented that efforts to bring this cohort back up to speed could be impacted/ interrupted by the additional autumn exam series.

Some respondents commented that additional support would be needed for disadvantaged and SEND students who did not have access to usual learning support when not in school or college. It was noted that time would be needed to assess and put in place access arrangements for students. These comments are covered in more detail in the equality impact assessment section.

Respondents expressed views that the burden and pressure of the additional workload to catch up would impact on students as well as teaching staff.

Some teachers expressed concerns that the limited adjustments proposed to core subjects could lead to Heads of centres deciding to allocate more timetabled time to those subjects, taking away teaching time from other subjects that students choose as options. A few suggested that students should be permitted to drop subjects if the proposals are implemented.

A few respondents said that more time would need to be given to centres to assess and make decisions on tiers of entry for students, for tiered subjects.

### **Potential for further public health disruption to teaching and learning**

Many respondents commented that the proposals assume there will be no future local or national school closures. A number of respondents stressed the need for all students to have the technology for home study. Some teachers were concerned about the impact of lost extracurricular visits and trips.

### **Non-exam assessment – common themes**

Some teachers highlighted the particular support and catch up plans needed for the practical elements of a range of subjects that will have not been undertaken at home. They also noted the potential difficulties that public health restrictions could create for practical group activities for some non-exam assessments, highlighting that more staff, more space and more equipment (to reduce the sharing of materials) would likely be required, for example for food and nutrition, music, drama, and PE.

Many teachers suggested the need for later moderation to allow more time for students to complete and teachers to mark the non-exam assessments. Some said that in particular, time must be given to prepare and make video recordings, or to prepare and submit digital portfolios, where required. For some subjects, for example the proposed arrangements for MFL speaking, some respondents said that workload would likely increase, and additional training or expertise required to meet new requirements. Some respondents said that it would be burdensome to start again on subjects where non-exam assessment requirements were changing, and centres had already started (or completed) work under existing requirements. The range of comments on non-exam assessment proposals for individual subjects is reported in the individual subject sections of this analysis.

### **Exam delivery**

A number of respondents commented on the delivery of the 2021 exams series if the timetable was changed or if public health safeguards were needed. They raised concerns about the availability of invigilators who might consider the role would expose them to health risks and that vulnerable students might need to be

accommodated separately. More time would be needed between exam sittings than usual to allow for cleaning/sanitising desks.

### **Exam board activities**

One exam board set out some of the expected impacts of the proposals.

“Changes to submission times of NEA may result in challenges with compliance for awarding organisations and/or centres. New marking criteria will need to be written for subjects where NEA work is changing (e.g. changing MFL speaking tests to endorsements and changing requirements for Dance or Music). Teachers and moderators will need to be trained in applying these changed criteria, which will be burdensome as such training will need to be developed and delivered by awarding organisations, and undertaken by teachers at a time when they are dealing with the disruption caused by lockdown for not just next year’s exam cohort but by students in all year groups.” (Awarding body or exam board)

This exam board also highlighted it would need to change how it met certain regulatory requirements if it had to produce different form of assessment for 2021 only.

Another exam board expressed concerns that the proposals assume the 2021 exams series will take place and will not be affected by further public health disruption. They recommend that the planned approach supports contingency arrangements in the event that exams cannot go ahead. The exam board’s comments are reported under the paragraph headed ‘**Proposals for different approaches**’.

Two exam boards responded that they had not identified any activities beyond those set out in our consultation.

## **What additional costs do you expect you will incur if the proposed changes to the exam and assessment arrangements were introduced for summer 2021?**

We received 8,270 responses to this question.

### **Centres**

#### **Teaching staff costs**

Many respondents commented on the need for teachers and other centre staff to familiarise themselves with the changes and to plan and implement revised teaching arrangements for September, for relevant staff be trained, and then to deliver teaching and learning outside school hours to cover content missed in the period that centres have been closed.

“Very difficult to quantify but it will certainly fall on teachers who will be expected to re-plan. This is not a 'limited burden', as your consultation document suggests, but an enormous burden. We will be working all summer to ensure we are ready for a number of potential situations, after not having had a break since February half term. I wonder if the government will be doing the same?” (Teacher - responding in a personal capacity)

“This is unclear, but the time taken by all stakeholders to review the current plans would lead to hundreds of working hours across a number of different employees as a minimum.” (SLT – Senior leadership team)

“In terms of time, staff training would be required to ensure that all teachers understand the changes in the examinations and are fully prepared to teach accordingly. This would have to be done out of school hours to prevent yet more lost lesson time. (Teacher - responding in a personal capacity)

Some indicated that this would be a time - rather than monetary - cost with the work delivered within existing school budgets, while others indicated staff would be paid for additional teaching time. It was noted that this additional teaching in particular would be needed where little or no adjustments were proposed to assessment arrangements. Some noted that additional teaching resource may be needed to teach students in smaller groups.

“If exams go ahead on normal timetable schools will have no choice than to use out of hours to make up the content. Obviously this is not an extra monetary cost because staff will do this of their own free-will, but it is a cost in terms of the time staff spend. I feel time is more valuable to a teacher than money. Extra pressure to provide these lessons will mean time taken away from other classes or year groups in terms of planning and preparation for their lessons. It could also cause equality issues. Some schools/staff will do this more willingly than others for various reasons meaning the time students get allocated to a subject could vary massively nationally.” (Teacher - responding in a personal capacity)

“Paying teachers to run weekend/after school/holiday catch up sessions to cover the content missed during lockdown period.” (Teacher - responding in a personal capacity)

“Schools will undoubtedly open for students over the holidays. Schools who value their staff will pay them and incur a hefty financial cost. Schools who don’t will incur the cost of staff morale. This must be a funded endeavour.” (Teacher - responding in a personal capacity)

“Study support will be needed, costing in terms of support staff. Funding would be necessary to open college facilities during weekends and holidays to support disadvantaged students during the revision period.” (SLT – Senior leadership team)

“Potential increase in costs for schools if curriculum content that has to be assessed is not reduced, as additional teaching and work outside of the expected hours would have to take place. This would increase the physical and mental burden on teachers and students greatly as they will be playing ‘catch-up’ right through till next summer (and teachers will put certain things on hold, so the impact will be prolonged further).” (Teacher - responding in a personal capacity)

“It is the lack of change that will incur additional costs in staffing extra lessons and providing revision resources.” (SLT – Senior leadership team)

Payment of intervention tutors will go further into the academic year (£150 a day per member of staff). By not reducing content teachers will need overtime

payments to cover all content and run additional sessions. (Teacher - responding in a personal capacity)

Some commented that there would be additional costs in particular to support disadvantaged students and SEND students and that students with caring responsibilities or other domestic commitments might not be able to take advantage of any out of hours provision. A small number indicated that funding for SEND students usually only runs to the end of June, so would need to be extended if exams are delayed. Some noted that not all centres would be able to afford out of hours provision.

Some expressed views that any significant changes to content, or to the format and structure of assessments, will be burdensome for teachers who will need to familiarise themselves with and prepare to deliver the new approach.

A number of respondents highlighted that some of the proposals would mean increased costs to centres in employment of cover teachers. Examples included cover to release teaching staff to do the following activities:

- train, deliver and mark a new form of speaking assessments for MFL
- work as examiners
- plan for the next academic year, activity that would usually take place in 'gained time' once students have left

Others were concerned about the need to pay teachers extra if exams took place during what would otherwise be the holiday period.

“Should the exams be moved later in the year teachers’ contracts will need to be extended resulting in an increased staffing cost for some colleges.” (Teacher - responding in a personal capacity)

“Extension of Independent Schools teacher contracts.” (Teacher - responding in a personal capacity)

Some considered there may be additional staff costs for the provision of mental health and pastoral support for students, and also to put in place new arrangements for Y7 and Y12 transition if these cannot happen as they usually would due to exams taking place later.

The potential impact of the expected increased workload on teachers’ wellbeing was frequently raised as a non-monetary cost.

“It is less about cost for me as Head of Science, more about the fact that changes do not go far enough to alleviate pressure on students to catch up under very stressful circumstances and teachers to deliver this catching up with their own health and family challenges on top of having to reorganise the whole school based on new guidelines.” (Teacher - responding in a personal capacity)

“Costs will include emotional health; teachers having to take time off due to anxiety and stress if the exam cycle remains as proposed.” (SLT – Senior leadership team)

## **Of Non staff costs**

Respondents said that pushing back exams would lead to additional facility and catering costs for centres. Some respondents highlighted that the extension of the term could have significant financial implications for boarding schools.

“Approximately £212,000 to provide boarding for 160 students at a cost of £63 per day over three weeks in July. This does not include the cost in ensuring the school is staffed by teachers.” (School or college)

Some respondents commented that centres would incur extra costs if books could not be shared because of public health safeguards. A few highlighted that textbooks had not been returned by students who were due to take exams this year and had now left the centre. The costs of subscription to online revision resources, or provision of revision materials to students, in addition to textbooks were also raised. A few respondents noted that if open book exams were permitted this could be costly if centres were expected to pay for new, clean copies. A small number indicated that changes to specifications would increase costs of learning and revision materials.

“This depends on what exactly changes. If the content is reduced then there will not be additional costs. If there are significant changes to the specification that require additional textbooks, revision guides etc. then the cost could be between £2000-£4000 depending on what is released.” (Teacher – responding in a personal capacity)

Respondents commented on some costs related to the teaching and learning environment more broadly, including costs of setting up digital learning platforms for delivery of remote learning, and the provisions of any required personal protection equipment.

A small number of respondents cited costs to centres ranging from £1,000 to £30,000 but without specifying what these costs related to. Some respondents said that until changes were confirmed it would be difficult to comment on likely costs. A number of respondents, predominantly teachers, said that they did not expect any costs to be incurred by centres, or that they were unsure or not aware of any likely costs.

## **Costs relating to delivery and assessment of practical work**

Extra costs for practical work and non-exam assessment across different subjects were highlighted by some including:

- more space to allow for distancing
- more staff to work with smaller groups or ‘bubbles’
- more materials/ equipment/ resources to limit sharing, or to ensure there is sufficient to allow time for cleaning between sharing
- for some subjects, additional specialist staff will be required (such as videographers, dance artists, sports coaches)

## **Subject specific costs**

A number of respondents commented on expected costs of delivering and assessing practical work in particular subjects. The most frequently raised costs are set out below.

**Geography:** For GCSE, comments included:

- lost deposits for fieldwork already booked, that parents might expect centres to reimburse
- cost saving if they did not have to for fieldwork
- loss of income to field study centres.

For AS and A level comments included:

- the extra costs of undertaking multiple short trips in the place of one residential trip – with more coaches required to allow distancing
- the costs of rebooking fieldwork
- the costs of additional fieldwork equipment.

“We would have to find a way to reimburse parents who have already paid for their daughters to attend a field trip in October. The deposit is non-refundable.” (Teacher - responding in a personal capacity)

“Potentially having to purchase fieldwork equipment. This may cost in excess of £1000.” (Teacher - responding in a personal capacity)

“Costs of booking extra transport so all students can travel safely to fieldwork locations.” (Academy chain)

**Drama:** Many respondents said that centres would need to pay to access streamed theatre performances, and that in particular costs would be higher if exam board restrictions on performances more than five years old is maintained. Some also said they would incur costs on purchasing additional texts for monologue and duologue performances. A few referred to costs of equipment to record performances.

“I know there are live theatre streaming services free at the moment. But they are only available for a limited time. So once schools go back this means they will go back to paid subscriptions. A digital theatre subscription costs around £1000 for the year and this has a big impact on budget” (Teacher - responding in a personal capacity)

“The cost of paying subscriptions for Digital Theatre to enable access to high-quality theatre. This is a significant cost. Theatre has been offered free by NTL Live and The Globe over the lockdown period but might well not continue from September. We will need to invest in better quality video equipment if performances, which have been externally examined, move to video recording for moderation/assessments.” (Teacher – responding in a personal capacity)

“I have budgeted for a possible £1500 on texts including more monologues and duologues.” (Teacher - responding in a personal capacity)

**Sciences:** A few respondents noted the cost savings of students watching demonstrations of science practicals at GCSE rather than doing the practicals themselves. Others said centres would have to pay for equipment such as visualisers, software for simulation of science experiments and for videos of science practical experiments. For A level, some respondents highlighted likely costs of purchasing additional equipment for practical work, to limit sharing between students. A few said that new PPE would be needed as their schools had donated theirs to the NHS or care homes.

“We need lots more equipment in order to fulfil these practical arrangements with the current CLEAPS guidance. I have calculated that we will need to purchase equipment totalling £13,000 (just for A level Biology). This is 6 x our normal yearly budget!” (Teacher - responding in a personal capacity)

“If A-level CPAC requirements are not removed, we would have to purchase significant amounts of equipment and technical support which our budget does not cover. For example, goggles, lab coats, eye protection, microscope eyepieces, etc. cannot be shared.” (Teacher - responding in a personal capacity)

“Costs of visualisers and interactive whiteboards to ensure “demos” of practicals are to the highest quality and students are able to interact as much as possible.” (Teacher - responding in a personal capacity)

**MFL:** Many respondents argued (in response to all three regulatory impact questions) that the proposed changes to MFL speaking assessment would increase teachers’ workload, noting in particular that the training to deliver the new form of assessment NEA would be time consuming. As mentioned above in the section on staff costs, some said they expected that cover costs would be incurred to release teachers to train for, conduct and mark the assessments. A small number thought it might be cost neutral, with a couple suggesting that invigilator costs might be saved. Some also queried whether the change in assessment arrangements would result in a saving for the exam boards, that could be passed back to centres through lower fees. A few respondents noted the possible loss of employment for foreign language assistants – with one centre noting that this would be saving in terms of staff cost.

“There is a massive time/cost implication if MFL teachers have to go back to assessing the NEA speaking task, plus training and CPD needs. This would not impact exam boards as they would save money in employing examiners to mark them.” (Teacher - responding in a personal capacity)

“Training costs if the speaking exam is to be marked by teachers - this is currently marked by moderators, so training for teachers will be needed to ensure standardised results.” (Teacher - responding in a personal capacity)

“Time to mark the speaking exams - we would need to be covered for this. It takes approximately 1/2 hour to mark 1 MFL student GCSE speaking exams properly” (Teacher - responding in a personal capacity)

**PE:** A number of respondents commented on expected costs to centres of hiring sports facilities, purchasing new equipment for individual sports and, in some cases, paying for sports coaching. Many commented on the time and costs associated with recording and storing students’ performance, highlighting that additional video equipment, memory sticks, editing software and sufficient secure storage facilities would be required, with some adding that additional technical staff (e.g. videographers) may be needed.

“Extra sporting equipment needed for individual sports.” (Teacher - responding in a personal capacity)

“Hiring of offsite facilities for athletics tracks, swimming pools etc.” (Teacher - responding in a personal capacity)

“The filming of students in a large secondary comprehensive school would require considerable time and the employment of a P.E. technician.” (School or college)

“For PE it would be investment in video equipment to record footage and allow for remote moderation to a high standard.” (Teacher - responding in a personal capacity)

**Art & Design:** Respondents commented that if they were to submit digital portfolios to the exam board training would be needed and equipment bought. Some said there would be costs to centres of providing more art materials to limit sharing between students. A few respondents noted there may be savings resulting from the removal of the timed exam.

“Training for photography and cameras, time that would be needed to photograph hundreds of students work in some centres, to the standard needed to fairly represent students” (Teacher – responding in a personal capacity)

“Costs of specialist art and design equipment for students working at home. Time cost of developing new resources. Financial and time cost of producing digital portfolios for moderation.” (Teacher – responding in a personal capacity)

**Food:** Some respondents noted the cost savings from the proposed removal of the first non-exam assessment, although extra equipment might need to be bought to avoid sharing.

**Design & Technology:** A few respondents commented on potential additional costs for equipment such as 3D printers and modelling software for production of prototypes and mock-ups.

**Music:** A few respondents commented on potential additional costs for music lessons, instruments and equipment such as microphones and headphones.

**Digital equipment costs – general:** Some respondents commented on potential costs of buying cameras, video/recording equipment and technician support for use in a range of subjects.

“Digital technology to ensure recordings of dance, drama and music performances are high definition.” (Teacher – responding in a personal capacity)

### **Exam entry fees and centre delivery costs**

Respondents commented that the autumn exam series means unbudgeted costs for centres of two sets of entry fees, extra staffing and accommodation in one academic year.

A few respondents said centres were waiting for refunds from exam boards for 2020. Some suggested that exam boards should not charge for late changes to tiers of entry in 2021.

Respondents highlighted that if exams are compressed into a shorter period, with more sittings at the same time, more invigilators and staff who support access arrangements will be needed – even if overall the hours worked are the same as

usual. They commented that this would also mean increased recruitment and training costs.

Some said there would be costs to hire bigger venues to accommodate social distancing and for SEND adjustments, also higher than usual cleaning costs, and potential PPE costs for both invigilators and students. A few highlighted potential concerns around handling of question papers and scripts safely.

Some respondents suggested that if there were to be fewer and shorter exams, centres would save on entry fees and accommodation and staffing.

A few respondents commented that school budgets are stretched and have been impacted by lost revenue from facility lettings in 2020.

### **Costs to students, parents and carers**

Many students and parents or carers were concerned they would lose money as a result of holiday cancellations if exams were later and a few referred to the costs of wedding cancellations. Many explained that they had already booked holidays for July 2021 and some holiday were being deferred from 2020. Some were concerned that they would not be able to take advantage of lower term time holiday prices.

“Holiday cancellation costs would be huge and unaffordable. This would cause huge mental stress.” (Parent or carer)

“If exams are delayed and our insurance doesn't cover delays to holidays due to late sitting of GCSEs we stand to lose over £20,000. We would not be alone.” (Parent or carer)

“Normally exams are done no later than 29th June, after consulting with school I have had to rebook my wedding abroad with around 35 people, from July 1st as advised exams out of the way by then, now worried that my child will miss out on his GCSEs if they start late.” (Parent or carer)

“Possibly lose £4000 for wedding booked abroad from July 25th 2021”. (Parent or carer)

Some respondents commented on the costs to families of revision materials and private tutors, affordable only for some.

“We already have employed tutors for our children who will be in year 11 and year 13 in September. This is at an approximate cost of £100 per week. We have had to make lifestyle changes to accommodate these unforeseen costs.” (Other)

“Due to the lack of change in the content I will now have to pay to get my daughter a tutor in all three of her A-level subjects due to the lack of teaching in the lockdown period to ensure that she performs well in her exams.” (Parent or carer)

“If we had the money, we would have to employ tutors to catch my ADHD son up with missed work in every subject. This is totally unrealistic and the cost is immeasurable.” (Parent or carer)

A number of students and parents or carers highlighted the additional travel costs they would incur if students are required to attend school for an extended term, for example, costs of bus and train passes.

“If exams are delayed then students will have to continue to pay for travel to and from college which they would not have to do if exams take place at the normal time.” (Student)

Some commented that students would lose income from summer employment. A few suggested costs, ranging from £2000 - £5000, but without explaining what these costs relate to. A few commented on potential additional independent school fees if term is extended.

Many students and parents or carers said they did not expect to incur any costs as a result of the proposed changes to 2021 assessment.

Many respondents commented on the potential impact of catching up with missed teaching on students' mental health and wellbeing, as a non-monetary cost.

“Trying to fit the huge course content into less time would be mentally and emotionally strenuous for students. Examinations are already challenging, and the proposed changes don't go far enough to make up for the time lost - the students would suffer mentally.” (Student)

### **Costs to the HE sector arising from later release of results**

There were a few comments about potential costs to HE of delaying the issuing of results.

“The HE sector would incur significant costs in changing our process if the results dates were moved for either GCSEs or A Levels. Students would also have additional costs in rent payments if we were forced to move our term start if there was a delay to the results being published.” (Other representative or interest group)

“Financial and administrative costs to the HE Sector which may result in a much later than usual admissions cycle for 2021 entry would need to be explored in more detail with providers and UCAS.” (University or higher education institution)

### **Costs to exam boards**

One exam board highlighted that the changes introduce risks that will need to be managed and mitigated, and that this will come at a cost.

“The necessary changes, whatever they are ultimately determined to be, and in the concentrated period in which they have to be made, introduce risk. Much of that risk can be mitigated (involving more people, adding more checks, developing new products and services) – but each one will add cost, and not every new risk will be susceptible to mitigation, and overall the risk to the system will have been increased. The residual risk to the sector as a whole will have to be recognised and acceptable to all stakeholders.” (Awarding body or exam board)

Two exams boards referred to potential significant additional costs of developing and producing revised assessments and specifications (according to the extent of any changes).

Three of the four exam boards highlighted the likely additional costs of processing scripts (including scanning) and delivery of marking (including examiner recruitment and training) if exams take place later than usual, in part

through increased pay to attract markers to work during the holidays, and also to employ more markers so that the marking workload can be completed in time for results day. It was noted that more space than usual may be required for standardisation meetings. “If the timetable is moved back to start on June 7th we will have to pay more to examiners to ensure that marking can take place over the summer holidays. Additionally, if there is an expectation that results dates are the usual dates in August, we would have to appointment a much higher volume of examiners, train and quality assure, and monitor them to ensure that they are marking accurately and that all marking is achieved in a much shorter timescale than usual.” (Awarding body or exam board)

“Additional examiner and moderator training will have to be developed and delivered in order to promote understanding of the changes and to allow engagement and familiarisation with new methods of assessment (e.g. video instead of visits) [...] Examiner shortages in July and August may result in additional incentive payments having to be offered when practising teachers will necessarily want to focus on making up for lost teaching time.” (Awarding body or exam board)

One exam board highlighted the expected costs of providing information and support to centres on any assessment changes, including delivery of CPD, network events, newsletters and bespoke emails and resources relating to new assessment products.

“The introduction of the proposed changes for summer 2021 will require exam boards to provide a rolling programme of information and support. It will be essential to have clear guidance in place for centres as to how each adaptation will operate and the implications for their teaching as early as possible and before teaching starts in September. The timely provision of information about changes and the provision of accompanying support is, of course, a regulatory requirement. The timescales for introducing the changes are extraordinarily short compared with usual practice [...] Although it is not possible to quantify the overall costs at this stage, it is clear that they will be substantial and this has implications for how costs are best recouped.” (Awarding body or exam board)

Another exam board made similar comments about the costs of events and support materials for both centres and students.

“Teacher support events and exemplar materials, teacher standardisation materials and events for a range of subjects will be required in much greater number and scope, and for which new content will have to be devised and produced [...] For subjects where amendments to assessments are needed, we feel we would have to issue new specimen materials to help students familiarise themselves with the assessment before they take the real papers. This brings significant additional cost for each assessment.” (Awarding body or exam board)

This exam board also highlighted costs of additional staffing (within the organisation) and system development.

One exam board commented on potential additional costs to centres, highlighting that delay to the exam series would mean centre staff would be expected to be available into the summer holidays to deal with exam board ‘exam series closure

activities'. This exam board commented on potential costs associated with GCSE history (including in relation to examiners), and also noted that centres may consider the MFL changes will deliver savings to exam boards that should be reflected in reduced fees.

## **We would welcome your views on any suggestions for alternative approaches that could reduce both burden and costs.**

We received 6,889 responses to this question.

### **Reducing costs**

Many respondents suggested the priority should be student and teacher health and well-being not the costs or savings of the proposals.

### **Proposals for different approaches**

Many respondents argued for more significant changes across all subjects, to reduce the burden of teaching and learning on students and teachers, such as reduced content, increased question optionality as captured in questions 1 and 13. Respondents suggested that adjustments that make teaching and learning manageable also serve to reduce the burden of exam delivery and marking.

Many respondents proposed alternative approaches to assessment in 2021, including repeating the 2020 approach, or increasing teacher assessment and relying less on exams. Suggestions included:

- cancel exams and repeat the 2020 approach of Centre Assessment Grades/ rank orders - some saying the 2021 cohort is more disadvantaged than 2020 cohort and therefore it is the only fair approach
- assess through part exam and part Centre Assessment Grade - for example, the teacher provides a Centre Assessment Grade for the non-exam assessment element
- hold exams in core subjects only; Centre Assessment Grades or teacher assessment for other subjects
- less weight on exams, increased weight on teacher assessment
- return to a modular approach, with external assessments taking place in winter, spring and summer (or similar)
- put in place online exams.

Some respondents highlighted that less reliance on the end of course exam and more on teacher assessment (or some form of evidence gathering through the year) could help if exams are cancelled again. They urged that the changes put in place now also support any contingency 'plan B' – and that such a plan is communicated as soon as possible.

“We have concerns that the consultation is framed on the assumption that a full and uninterrupted exam series will take place in summer 2021 when, in reality, this may not be the case. There is a need for processes that recognise the seriousness of the amount of learning and support that has already been lost, and which anticipates the possibility that public health issues will mean

that a full summer series in all localities may not be possible. We strongly recommend measures are taken so that the 2021 assessment arrangements have some built-in resilience to allow for this. This should include the introduction of a commonly agreed framework for gathering evidence of student performance which is robust enough to inform the issuing of results. We would not rule out an increased use of teacher assessment as part of a basket of approaches to awarding. Such contingencies are necessary and can be delivered in a way that supports teaching and learning without detracting in a disproportionate way from available teaching time. However, we will need to explore such approaches as a matter of urgency.” (Awarding body or exam board)

“You need to tell teachers what Plan B is if we go through a second wave! Tell us NOW what data you would want so that we can gather it through ongoing assessment and provide the CAG's / rank at the click of a button.” (Teacher - responding in a personal capacity)

Some respondents argued that non-exam assessments should be removed, for example, in A level Geography, with assessment by exam only, to free up teaching time and to avoid problems caused by public health restrictions.

A few respondents expressed views that overall, the proposals were sensible, and they could not identify better approaches.

“I feel that what is proposed sounds like a sensible approach. I can't think of an alternative that would be fair and equitable”. (Teacher - responding in a personal capacity)

## **Teaching and Learning**

Many respondents emphasised the need for early decisions and guidance to help them plan for September and for early training on how to implement any new arrangements, for example, for MFL and Art & Design.

A number of respondents suggested the need for additional government funding for centres to cover costs of additional teaching, including weekend and holiday sessions and additional pastoral support and that an upper limit should be put on teachers' working hours.

Local authority 'revision hubs' or 'booster revision sessions' were suggested together with the option for students to drop some subjects.

Some commented in this section about wider issues relating to the teaching and learning environment from September, including:

- students' access to technology to support home study
- autumn exams taking place outside of schools and colleges
- funding for cleaning and PPE equipment

## **Provision of teaching and learning and revision resources to centres**

Many respondents urged exam boards to provide free resources and revision materials, such as knowledge organisers, revision packs/apps, online textbooks, downloadable versions of set texts and sample assessment materials/practice exam papers, especially where assessment arrangements are changing. Some respondents requested free resources for specific subjects, including free theatre

streaming for drama and videos of science practicals. Some asked that 2020 exam papers be released to centres.

A learned society offered to work with exam boards and centres to share resources and expertise.

### **Exam delivery and marking**

Respondents made a number of proposals about the timing of the exams; these are covered under questions 7-12.

Exams officers or managers asked for early confirmation of 2021 arrangements to allow them to plan.

A number of respondents repeated concerns about marker availability if exams are delayed, suggesting teachers could be released from teaching to mark and that enhanced payment might incentivise more to do so.

“Results days should be moved by the same number of working days as the exam start dates are moved, in order to avoid high script volumes arriving together and to allow sufficient time for marking and quality-assurance. This would, however, require flexibility from UCAS, HE and other stakeholders”.  
(Awarding body or exam board)

“The results date should be considered as part of the review of the exam timetable and this will help reduce the burden of the additional marking and processing costs.” (Awarding body or exam board)

### **Information to students and their parents and carers**

Some respondents said that it would be helpful and reduce burden on centres if Ofqual/government could develop and publish clear information about the revised assessment arrangements for students and their parents or carers.

### **Student travel costs**

A number of respondents said the students should receive support with travel arrangements and costs – for example free bus or train passes – if required to stay on at school to complete exams later than expected.

### **Comments on reducing costs and burdens in individual subject arrangements**

Respondents suggested how burden could be reduced in some subjects, and the proposed 2021 assessment arrangements made manageable for teachers and students. These comments are reported in the individual subject sections, and any costs are reported above.

Some general themes on reducing cost and burden in relation to non-exam assessment included:

- the time required to record/ submit digital work if examiners/moderators cannot visit, for example, in PE or Art & Design
- the costs of any additional materials/ equipment/resources, including in particular for subjects where digital portfolios/video recordings are required
- guidance on carrying out practical work safely

### **Other comments**

A few respondents commented that after months of working online, returning to handwriting might be an issue for some students.

Some suggested there should be no progress 8 measure/performance tables published in 2021.

Some said they urgently need to know arrangements for 2022 so they can plan fieldwork/non-exam assessment for the new year 10/year 12.

# Appendix A – breakdown of the responses for each question by respondent group<sup>6</sup>

**Q1. To what extent do you agree or disagree that the 2021 exams should not include more optional questions than usual?**

Q1	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	232	21%	192	18%	169	16%	210	19%	279	26%	1,082
Academy chain	18	19%	20	22%	19	20%	14	15%	22	24%	93
Awarding body or exam board	5	36%	3	21%	0	0%	3	21%	3	21%	14
Employer	2	67%	0	0%	0	0%	0	0%	1	33%	3
Local authority	1	5%	3	14%	9	43%	4	19%	4	19%	21
Other representative or interest group	10	12%	16	19%	19	23%	19	23%	19	23%	83
Private training provider	1	20%	1	20%	3	60%	0	0%	0	0%	5
School or college	193	23%	147	17%	117	14%	169	20%	226	27%	852
University or higher education institution	2	18%	2	18%	2	18%	1	9%	4	36%	11
Personal	5,282	19%	4,931	18%	4,373	16%	6,639	24%	6,321	23%	27,546
Awarding organisation employee	16	28%	8	14%	8	14%	9	16%	16	28%	57
Consultant	14	21%	10	15%	8	12%	16	24%	18	27%	66
Examiner	54	27%	50	25%	35	18%	32	16%	27	14%	198
Exams officer or manager	44	15%	77	26%	76	25%	68	23%	36	12%	301
Governor	6	11%	11	19%	7	12%	15	26%	18	32%	57
Other	51	20%	51	20%	43	17%	57	22%	57	22%	259
Parent or carer	755	18%	707	17%	533	13%	1,010	24%	1,134	27%	4,139
SLT (Senior leadership team)	343	22%	257	16%	149	9%	379	24%	457	29%	1,585
Student	722	18%	573	14%	569	14%	1,023	25%	1,162	29%	4,049
Student - private, home-educated of any age	29	26%	17	15%	12	11%	25	23%	28	25%	111
Teacher (responding in a personal capacity)	3,248	19%	3,170	19%	2,933	18%	4,005	24%	3,368	20%	16,724

No response 344

**Q3. To what extent do you agree or disagree that the number of exams taken for each subject in 2021 should be the same as usual?**

Q3	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	192	18%	284	26%	134	12%	206	19%	263	24%	1,079
Academy chain	11	12%	20	21%	10	11%	26	28%	27	29%	94
Awarding body or exam board	3	21%	2	14%	1	7%	4	29%	4	29%	14
Employer	0	0%	0	0%	0	0%	0	0%	3	100%	3
Local authority	3	16%	4	21%	7	37%	1	5%	4	21%	19
Other representative or interest group	11	14%	22	27%	19	23%	13	16%	16	20%	81
Private training provider	3	60%	1	20%	1	20%	0	0%	0	0%	5
School or college	159	19%	233	27%	94	11%	161	19%	205	24%	852
University or higher education institution	2	18%	2	18%	2	18%	1	9%	4	36%	11
Personal	3,720	13%	6,808	25%	3,450	12%	6,886	25%	6,747	24%	27,611
Awarding organisation employee	14	25%	12	21%	9	16%	10	18%	11	20%	56
Consultant	20	30%	16	24%	5	8%	13	20%	12	18%	66
Examiner	70	36%	64	32%	14	7%	25	13%	24	12%	197
Exams officer or manager	68	23%	110	36%	34	11%	60	20%	30	10%	302
Governor	9	16%	18	33%	2	4%	12	22%	14	25%	55
Other	49	19%	60	23%	44	17%	45	17%	61	24%	259
Parent or carer	534	13%	1,011	24%	498	12%	986	24%	1,122	27%	4,151
SLT (Senior leadership team)	204	13%	371	23%	200	13%	402	25%	409	26%	1,586
Student	437	11%	651	16%	438	11%	1,077	27%	1,458	36%	4,061
Student - private, home-educated of any age	15	14%	20	18%	10	9%	21	19%	45	41%	111
Teacher (responding in a personal capacity)	2,300	14%	4,475	27%	2,196	13%	4,235	25%	3,561	21%	16,767

No response 282

<sup>6</sup> Respondents to the consultation self-identified the group to which they belonged. The number of responses reported in the tables are based on these unverified self-descriptions.

**Q5. To what extent do you agree or disagree that the exams taken in 2021 should not be longer than usual?**

Q5	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	608	57%	244	23%	109	10%	52	5%	63	6%	1,076
Academy chain	41	44%	27	29%	16	17%	4	4%	6	6%	94
Awarding body or exam board	7	54%	5	38%	0	0%	0	0%	1	8%	13
Employer	2	67%	0	0%	0	0%	1	33%	0	0%	3
Local authority	9	47%	2	11%	6	32%	0	0%	2	11%	19
Other representative or interest group	32	39%	26	32%	13	16%	5	6%	6	7%	82
Private training provider	4	80%	0	0%	0	0%	1	20%	0	0%	5
School or college	508	60%	183	22%	71	8%	41	5%	46	5%	849
University or higher education institution	5	45%	1	9%	3	27%	0	0%	2	18%	11
Personal	13,150	48%	7,163	26%	2,894	11%	2,446	9%	1,906	7%	27,559
Awarding organisation employee	32	56%	11	19%	7	12%	4	7%	3	5%	57
Consultant	36	55%	19	29%	5	8%	4	6%	2	3%	66
Examiner	110	56%	58	29%	10	5%	10	5%	10	5%	198
Exams officer or manager	162	54%	100	33%	13	4%	17	6%	9	3%	301
Governor	22	39%	20	35%	3	5%	7	12%	5	9%	57
Other	117	45%	76	29%	22	8%	27	10%	18	7%	260
Parent or carer	1,862	45%	1,053	25%	487	12%	424	10%	313	8%	4,139
SLT (Senior leadership team)	921	58%	379	24%	127	8%	85	5%	73	5%	1,585
Student	1,337	33%	776	19%	569	14%	701	17%	668	16%	4,051
Student - private, home-educated of any age	37	33%	23	21%	8	7%	20	18%	23	21%	111
Teacher (responding in a personal capacity)	8,514	51%	4,648	28%	1,643	10%	1,147	7%	782	5%	16,734

No response 337

**Q7. To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 if results can still be released on 26 August 2021?**

Q7	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	452	42%	316	29%	126	12%	88	8%	103	9%	1,085
Academy chain	36	38%	29	31%	16	17%	6	6%	7	7%	94
Awarding body or exam board	3	23%	4	31%	1	8%	1	8%	4	31%	13
Employer	1	33%	1	33%	0	0%	0	0%	1	33%	3
Local authority	7	39%	3	17%	6	33%	0	0%	2	11%	18
Other representative or interest group	28	31%	32	36%	16	18%	5	6%	8	9%	89
Private training provider	3	60%	1	20%	0	0%	1	20%	0	0%	5
School or college	371	44%	244	29%	82	10%	75	9%	80	9%	852
University or higher education institution	3	27%	2	18%	5	45%	0	0%	1	9%	11
Personal	9,963	36%	8,444	31%	4,237	15%	2,478	9%	2,256	8%	27,378
Awarding organisation employee	22	39%	16	28%	10	18%	3	5%	6	11%	57
Consultant	26	39%	22	33%	8	12%	6	9%	4	6%	66
Examiner	69	35%	57	29%	27	14%	25	13%	21	11%	199
Exams officer or manager	74	25%	87	29%	33	11%	50	17%	58	19%	302
Governor	23	40%	16	28%	7	12%	5	9%	6	11%	57
Other	87	33%	84	32%	45	17%	24	9%	22	8%	262
Parent or carer	1,508	37%	1,043	25%	655	16%	384	9%	531	13%	4,121
SLT (Senior leadership team)	693	44%	523	33%	132	8%	128	8%	106	7%	1,582
Student	826	21%	827	21%	1,223	31%	409	10%	621	16%	3,906
Student - private, home-educated of any age	35	32%	15	14%	24	22%	16	15%	18	17%	108
Teacher (responding in a personal capacity)	6,600	39%	5,754	34%	2,073	12%	1,428	9%	863	5%	16,718

No response 509

**Q8. To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

Q8	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	272	25%	254	23%	138	13%	217	20%	204	19%	1,085
Academy chain	22	23%	24	26%	14	15%	23	24%	11	12%	94
Awarding body or exam board	3	23%	5	38%	2	15%	1	8%	2	15%	13
Employer	1	33%	0	0%	0	0%	1	33%	1	33%	3
Local authority	2	11%	1	6%	6	33%	7	39%	2	11%	18
Other representative or interest group	19	21%	19	21%	15	17%	21	23%	16	18%	90
Private training provider	2	40%	1	20%	0	0%	1	20%	1	20%	5
School or college	222	26%	203	24%	96	11%	161	19%	169	20%	851
University or higher education institution	1	9%	1	9%	5	45%	2	18%	2	18%	11
Personal	6,251	23%	7,565	28%	4,383	16%	5,148	19%	3,979	15%	27,326
Awarding organisation employee	18	32%	17	30%	10	18%	4	7%	8	14%	57
Consultant	16	24%	26	39%	4	6%	15	23%	5	8%	66
Examiner	53	27%	55	28%	21	11%	43	22%	25	13%	197
Exams officer or manager	33	11%	71	24%	19	6%	86	28%	93	31%	302
Governor	8	14%	18	32%	6	11%	12	21%	12	21%	56
Other	58	22%	77	30%	46	18%	47	18%	33	13%	261
Parent or carer	984	24%	930	23%	663	16%	735	18%	807	20%	4,119
SLT (Senior leadership team)	393	25%	418	26%	117	7%	345	22%	314	20%	1,587
Student	572	15%	729	19%	1,152	30%	555	14%	870	22%	3,878
Student - private, home-educated of any age	28	26%	19	18%	27	25%	13	12%	21	19%	108
Teacher (responding in a personal capacity)	4,088	24%	5,205	31%	2,318	14%	3,293	20%	1,791	11%	16,695

No response 561

**Q10. To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 if results can still be released on 19 August 2021?**

Q10	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	378	36%	283	27%	252	24%	51	5%	85	8%	1,049
Academy chain	29	32%	27	29%	27	29%	4	4%	5	5%	92
Awarding body or exam board	2	17%	6	50%	1	8%	0	0%	3	25%	12
Employer	1	33%	0	0%	1	33%	0	0%	1	33%	3
Local authority	7	39%	3	17%	6	33%	0	0%	2	11%	18
Other representative or interest group	28	32%	33	38%	16	18%	4	5%	6	7%	87
Private training provider	4	80%	1	20%	0	0%	0	0%	0	0%	5
School or college	305	37%	209	25%	198	24%	43	5%	67	8%	822
University or higher education institution	2	20%	4	40%	3	30%	0	0%	1	10%	10
Personal	8,915	33%	7,367	27%	6,422	24%	2,019	8%	2,104	8%	26,827
Awarding organisation employee	16	29%	19	35%	12	22%	2	4%	6	11%	55
Consultant	27	41%	20	30%	11	17%	7	11%	1	2%	66
Examiner	58	30%	60	31%	35	18%	18	9%	23	12%	194
Exams officer or manager	68	23%	76	26%	60	20%	47	16%	47	16%	298
Governor	19	34%	15	27%	12	21%	5	9%	5	9%	56
Other	84	33%	63	25%	71	28%	16	6%	18	7%	252
Parent or carer	1,099	28%	856	22%	1,267	32%	266	7%	467	12%	3,955
SLT (Senior leadership team)	637	41%	422	27%	313	20%	107	7%	78	5%	1,557
Student	1,040	27%	829	21%	754	19%	488	13%	779	20%	3,890
Student - private, home-educated of any age	36	34%	23	22%	16	15%	9	8%	22	21%	106
Teacher (responding in a personal capacity)	5,831	36%	4,984	30%	3,871	24%	1,054	6%	658	4%	16,398

No response 1,096

**Q11. To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

Q11	Strongly Agree		Agree		Neither Agree nor Disagree		Disagree		Strongly Disagree		Total
Organisation	236	23%	204	19%	248	24%	178	17%	182	17%	1,048
Academy chain	22	24%	12	13%	27	30%	18	20%	12	13%	91
Awarding body or exam board	2	17%	4	33%	2	17%	1	8%	3	25%	12
Employer	1	33%	0	0%	1	33%	0	0%	1	33%	3
Local authority	3	17%	0	0%	10	56%	3	17%	2	11%	18
Other representative or interest group	18	20%	20	23%	15	17%	19	22%	16	18%	88
Private training provider	2	40%	2	40%	0	0%	0	0%	1	20%	5
School or college	188	23%	164	20%	189	23%	137	17%	143	17%	821
University or higher education institution	0	0%	2	20%	4	40%	0	0%	4	40%	10
Personal	5,190	19%	6,111	23%	6,697	25%	4,549	17%	4,259	16%	26,806
Awarding organisation employee	10	19%	18	34%	11	21%	5	9%	9	17%	53
Consultant	19	29%	17	26%	7	11%	15	23%	7	11%	65
Examiner	45	23%	44	23%	33	17%	39	20%	34	17%	195
Exams officer or manager	28	9%	46	15%	53	18%	84	28%	86	29%	297
Governor	7	12%	14	25%	11	20%	12	21%	12	21%	56
Other	59	23%	59	23%	60	24%	43	17%	32	13%	253
Parent or carer	636	16%	636	16%	1,282	32%	617	16%	781	20%	3,952
SLT (Senior leadership team)	335	21%	347	22%	317	20%	289	18%	275	18%	1,563
Student	635	16%	629	16%	771	20%	641	16%	1,210	31%	3,886
Student - private, home-educated of any age	23	21%	19	18%	17	16%	15	14%	33	31%	107
Teacher (responding in a personal capacity)	3,393	21%	4,282	26%	4,135	25%	2,789	17%	1,780	11%	16,379

No response 1,118



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