

ANALYSIS OF CONSULTATION RESPONSES

How GCSE, AS and A level grades should be awarded in summer 2021



Department
for Education

ofqual

Contents

Introduction	4
Background	5
<i>What the grades will mean</i>	<i>5</i>
<i>When teachers should assess the standard at which students are performing</i>	<i>5</i>
<i>How teachers should determine the grades they submit to exam boards.....</i>	<i>5</i>
<i>The assessment period</i>	<i>6</i>
<i>The conditions under which students should be assessed.....</i>	<i>6</i>
<i>Supporting teachers.....</i>	<i>6</i>
<i>Internal quality assurance.....</i>	<i>6</i>
<i>External quality assurance.....</i>	<i>7</i>
<i>How students could appeal their grade</i>	<i>7</i>
<i>Private candidates</i>	<i>7</i>
<i>Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world.....</i>	<i>7</i>
Approach to analysis	8
<i>Who responded.....</i>	<i>9</i>
Views expressed	10
<i>Common themes.....</i>	<i>10</i>
Responses to the consultation questions	18
<i>What the grades will mean</i>	<i>18</i>
<i>When teachers should assess the standard at which students are performing</i>	<i>19</i>
<i>How teachers should determine the grades they submit to exam boards.....</i>	<i>29</i>
<i>The assessment period</i>	<i>68</i>
<i>The conditions under which students should be assessed.....</i>	<i>74</i>
<i>Supporting teachers.....</i>	<i>85</i>
<i>Internal quality assurance.....</i>	<i>86</i>
<i>External quality assurance.....</i>	<i>93</i>
<i>How students could appeal their grade</i>	<i>103</i>

<i>Private candidates</i>	<i>143</i>
<i>Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world.....</i>	<i>161</i>
Equality Impact Assessment	163
Regulatory Impact Assessment	185

Introduction

As a result of the disruption to the education of students caused by the coronavirus (COVID-19) pandemic, the government considers that exams cannot be held in summer 2021 in a way which is, and which is perceived to be, fair.

In reaching this position the government acknowledges that many schools are providing high-quality remote learning but there will be an impact on the coverage of the curriculum and students' exam preparation. This impact will vary between regions, schools within a region and students.

Government also recognised that students should have GCSE, AS and A level grades to continue to the next stage of their education or training, or into employment. Grades must reflect what a student knows, understands and can do, and they must be widely understood and respected.

Ofqual and the Department for Education (DfE) have consulted jointly on proposals that, in place of exams in summer 2021, students' grades will be based on their teachers' assessment of the standard at which they are performing.

This is the summary of responses to our [consultation](#) that ran between 15 January and 29 January 2021 and to which we received 100,596 completed responses.

In this consultation, we sought views on:

- what the grades will mean
- when teachers should assess the standard at which students are performing
- how teachers should determine the grades they submit to exam boards
- the assessment period
- the conditions under which teachers should be assessed
- supporting teachers
- internal quality assurance
- external quality assurance
- how students could appeal their grade
- private candidates
- whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world

Background

Students expecting to take GCSE, AS or A levels exams and assessments in summer 2021 have had their education disrupted, to a greater or lesser extent, by the coronavirus (COVID-19) pandemic.

In response the government considers that GCSE, AS and A level exams cannot be held in summer 2021. [Teacher assessments will be used](#) instead.

Ofqual and DfE jointly consulted on the alternative arrangements for summer 2021. Each organisation will publish separately their decisions.

What the grades will mean

Qualification grades should indicate what a person who holds the qualification knows, understands and can do, and to what standard. For qualification grades to be meaningful, a person who holds a qualification with a higher grade must have shown that their knowledge, understanding or skills are at a higher standard than a person who holds a qualification with a lower grade.

We proposed grades this year should be based on teachers' assessments of the evidence of the standard at which their students are performing.

When teachers should assess the standard at which students are performing

The interests of students will be best served if they engage fully with their education for the remainder of the academic year. This will allow them to cover as much of the curriculum as possible and, in turn, help them to move successfully on to the next stage of their lives.

We proposed that teachers should assess their students towards the end of the academic year. We gathered views on the extent to which work done earlier in the year should be taken into account. For subjects that are normally assessed using both exam and non-exam assessment, we proposed that exam boards should provide guidance on adjustments that could be made to the way non-exam assessment is completed.

How teachers should determine the grades they submit to exam boards

We proposed that teachers should assess their students objectively, using evidence of their performance on the content that has been delivered to them by their

teachers. To support them to do so we proposed the exam boards should provide guidance and training, along with papers which teachers could use to assess their students. We asked whether the use of exam board papers should be compulsory or optional. In subjects with existing non-exam assessment, we proposed teachers should take account of the standard of the student's non-exam assessment, whether partially or fully completed. We proposed that teachers should also be able to take other evidence of a student's performance into account when deciding on the grade to be submitted to the exam board.

The assessment period

We proposed that exam boards would provide papers that could be used by teachers within a set period of time. We also proposed that, in the interests of fairness and consistency, students assessed with and without the use of the exam board papers should be assessed as late as possible in the academic year.

The conditions under which students should be assessed

We expect that the assessment of students will take place within their school or college¹. We proposed, however, that if public health guidance does not allow this, students could be assessed at an alternative venue which may include a student's home, where that is an option.

Supporting teachers

We proposed that the exam boards should provide support materials and training and guidance to help teachers objectively and consistently assess their students' performance.

Internal quality assurance

We proposed that exam boards should provide support and information for schools and colleges on how they should assess their students. We also proposed that a key part of the internal quality assurance arrangements should be a declaration by the head of the school or college confirming that the exam boards' requirements had been met, that they support the grades submitted, and that all teachers who had

¹ For private candidates, this could be within the school or college with whom they are working, at their usual exam centre, or at an alternative examination venue.

assessed students had regard to the guidance and support materials that had been provided.

External quality assurance

We proposed that the exam boards should quality assure each school and college's approach, working together, where appropriate, to ensure consistency and reduce burden. We proposed the exam boards should require assurance about schools' and colleges' internal quality assurance arrangements and sample, at subject level, the evidence on which the submitted grades were based. We proposed that the exam boards should only change submitted grades after a review of the evidence and following discussion with the school or college.

How students could appeal their grade

We proposed that teachers should not tell students the grade they had submitted to the exam boards on their behalf but that once results were issued, a student who believes their teacher made an error in their assessment could appeal to their school or college on that basis. We proposed that a second stage appeal could be made to the exam board on the grounds that the school or college had not followed the correct procedure. In this section, we also sought views on whether results days in 2021 should be earlier.

Private candidates

We want to allow private candidates the opportunity to be awarded grades in 2021 and we sought views on possible approaches. These included the completion of exam board papers, working with a school or college who would assess the grade at which a private candidate was performing and allowing them to take normal exams.

Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world

We sought views as to whether the exam boards should be prohibited from offering exams in England, other parts of the UK and elsewhere.

Approach to analysis

The consultation was published on Ofqual's website and available for responses, using the online form, between 15 January and 29 January 2021.²

Many of the questions were closed; respondents could indicate the extent to which they agreed or disagreed with the proposals, using a 5-point scale (strongly agree, agree, neither agree nor disagree, disagree and strongly disagree). Some questions gave a choice of options such as whether the use of exam board papers should be optional or compulsory. We also asked open questions, inviting comments on the proposals.

Just over half of the responses came from students.

We have provided tables of the responses to the closed questions and presented them as charts showing the proportions of responses (percentages are rounded to the nearest whole number³). Where the percentage of respondents has been combined in a chart to represent the percentage that have strongly agreed/agreed or strongly disagreed/disagreed, the number in the chart may not correspond with the combined number in the table. This is due to the rounding of the individual percentages.⁴ We have provided additional information about the responses to the closed questions from different groups (percentages will vary dependent on the number of responses received from each respondent group for each question) in two appendices. We have highlighted where there were distinct differences between the respondent groups and have summarised any main themes.

Some themes were raised in response to more than 1 question, for example, the impact of the pandemic on the education of students. Where the issues being raised were specific to the questions, we have included these in the analysis for each of the related questions.

Respondents were invited to self-identify the group to which they belong. The tables use these unverified self-descriptions. There are 41 respondents who have self-identified as 'Awarding body or exam board'. The 4 organisations recognised by Ofqual to offer GCSE, AS and A level qualifications are referred to as exam boards: AQA, Eduqas, Pearson Edexcel and OCR. However, there are many more awarding

² Some responses were submitted by email through a variety of routes. These were taken into 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.

³ This has resulted in some of the figures in the charts adding up to percentages that total something other than 100. For example, questions 12 and 13 total 101%, and questions 11 and 56 total 99%.

⁴ This can be seen in, for example, questions 2, 12 and 13.

bodies offering other qualifications. Where the responses from exam boards differ to those from awarding organisations more generally, or where exam board responses differ between themselves, we have included details in the analysis for the relevant questions.

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. We considered these responses but do not include them in the data.

While we structure the report by question, some comments inevitably straddled 2 or more questions. As a result, we recognise that not all views expressed or the quotes 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 we have not changed their meaning.

Who responded

We had 100,596 responses to the consultation.

The appendices show how different groups responded to the questions.

The following tables are a summary of respondents by type.

Official responses	Number of respondents
Academy chain	147
Awarding body or exam board	41
Employer	17
Local authority	58
Other representative or interest group	269
Private training provider	72
School or college	1,801
University or higher education institution	74
Total	2,479

Personal responses	Number of respondents
Awarding organisation employee	82
Consultant	185

Examiner	361
Exams officer or manager	721
Governor	360
Other	1,069
Parent or carer	26,381
SLT (Senior leadership team)	3,569
Student	48,871
Student - private, home-educated of any age	1,908
Teacher (responding in a personal capacity)	14,610
Total	98,117

This was a public consultation which asked for the views of those who wished to participate. We were pleased to receive a very large number of responses, including many from students, and we 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.

Common themes

We have summarised below a number of common themes raised in response to many of the questions, to avoid repetition. Where the theme was extended in a way relevant to specific questions, this is reflected in the separate analysis of those questions.

Interpretation of the proposal for exam board papers

We proposed the exam boards should provide papers to support teachers assess the standard at which their students are performing. Many responses referred to such papers as ‘mini exams’⁵ taken in formal exam conditions which did not reflect

⁵ The consultation did not use the term ‘mini exams’ but this term had appeared in the media coverage of the consultation and was widely used by respondents.

the intent of the proposals. We asked whether the use of exam board papers should be optional or mandatory (question 9) and the conditions under which they could be taken (questions 28-30). However, it was clear that many respondents assumed when they answered these early questions that the papers would be taken under exam conditions.

Most respondents who made this assumption opposed the use of such papers. They were concerned that not all students would have covered the same content, and/or about different levels of support from schools and colleges during lockdown and self-isolation. Concerns were raised by all types of respondent about the different circumstances in which students have been studying. These included concerns over students' access to broadband, digital devices, caring responsibilities for siblings and lack of suitable study space.

“...Students will have to learn the same amount of content and will be under more stress as online learning is not providing the support or education students would have actually had being in school. Also students should not have to sit teacher assessments because an exam is an exam so you cannot cancel exams and replace it with exams...” (Student)

“Teachers must be given the flexibility to select the topics on which they set any assessment (whether an exam board paper or one of their own design). This will be fair for those students who have missed out on certain topics due to self-isolation and bubble isolation and those who have experienced barriers to online learning due to the digital divide (which we know is a real and worrying barrier for many young people).” (Parent or carer)

Many respondents referred to the deterioration of students' mental health since March 2020, raising concerns about the impact of assessments.

“I am concerned about the mental health impact of these proposals on our children. Children will see these as "mini exams" even if they are not supposed to be such. The lack of clarity on the content / format of these exams, at this late stage of the year, will add to their stress.” (Parent or carer)

This was frequently linked to their view that students had been told that examinations had been cancelled and that the proposals would reverse this decision.

“You have clearly stated that exams are cancelled, and now you are saying that we might have to sit exam papers. This is completely messing with students' mental health as we don't know what we're doing and neither do teachers. I myself, and my friends are really struggling with anxiety and mental health due to this” (Student)

Some, but considerably fewer, responses argued in favour of exams in one form or another because they provide equal opportunities for all students including those who are home educated and address concerns about the potential for teacher bias.

“Any system that replaces a controlled exam with results based on judgement will reflect the natural bias of the person(s) giving that judgement” (Parent or carer)

Responses from teachers and senior leadership teams tended to be more supportive of the use of exam board papers, seeing them as a means of providing evidence in a robust way that could be tailored to what has been taught. However, they often argued that these should be marked by exam boards not by teachers. This was frequently linked to concerns about workload, greater objectivity, and teachers' pay.

“As this would effectively be exams taken in the classroom, teachers would normally be paid extra for marking summer exams. Having class teachers mark all the papers will be time consuming and this should be reflected in additional payments to mirror that of the additional work undertaken.” (Teacher responding in a personal capacity)

Teacher assessment and differential disruptions to education

The majority of responses from all groups supported teacher assessment of students' performance across the full course of study with countless responses simply stating, 'trust teacher judgement'. Many argued a student's best performance from whenever in their course of study and whatever form of assessment, be it homework, mock examinations, non-exam assessment, etc, should be used.

“Students should be assessed on all the A level course throughout the 2-year period so including any assessments, homework, class work and coursework this would reward students who have engaged all the 2 years and worked hard not the students who are suddenly trying to impress the teacher now that the grades are to be given by the teachers and those who are just studying for any assessments the government sets. The A level should be awarded on the student's efforts and performance on the full course.” (Parent or carer)

Responses, particularly from students and parents and carers, frequently proposed that predicted grades, including those used for UCAS applications, should be awarded to students without any further assessment.

“I believe that we should be given our predicted grades as given to universities when we apply through UCAS, it is a true reflection of our potential, and after almost an entire school year of uncertainty for everyone and difficult times,

people are not performing as well as they would have been. The predicted grades would be the most fair outcome.” (Student)

Responses often referred to the arrangements used in summer 2020. Students and parents and carers tended to favour the use of Centre Assessment Grades (CAGs) similar to those used for 2020. Teachers tended to be less supportive of the arrangements for 2020 being followed, frequently expressing concerns about the pressure put on them by students, parents or their senior leadership teams. However, some teachers said that a teacher-only assessment approach is fairer and less burden.

Many respondents from all groups referred to the different ways by which students’ education has been disrupted. They noted the impact differed by region, between schools and colleges in the same region and even within the same school or college. Many commented on the uncertainty both about when students would return to school or college and of possible further disruption this year. Therefore, in their view, students could only be assessed by their teachers on the basis of whatever evidence was available to them.

“Students in my school have significant gaps in their learning from different points in the course since February 2020. Some students were self-isolating, some were ill with Covid, some were struggling with the effects of poor mental health, some were grieving - the list could go on. Although the quality of online learning is good in my school and many others, it is not always, and it cannot replace face to face learning. Some students are not coping learning from home and the impact upon their learning is profound. As teachers, we need to be able to use ongoing assessment... We must avoid externally set questions which will advantage some students that have been taught a particular topic in detail, face to face, and disadvantage others who might have missed some learning or are struggling to cope with online arrangements.” (Teacher - responding in a personal capacity)

Mental health, stress and anxiety

The majority of responses from all groups raised concerns about students’ mental health.

Concerns about teachers’ mental health, stress and anxiety tended to be linked to workload. In addition, some teachers’ responses raised concerns about pressure from students, parents and carers and, in some cases, their senior leadership teams, seeking to influence their assessments.

“I am extremely concerned about the impact on teacher workload of asking them to mark exam board papers. I am also concerned about the potential lack of

consistency and the opportunity for parents/students to put huge emotional pressure on teachers.” (SLT – Senior leadership team)

Teacher workload

Concerns were expressed from all respondent groups about the additional workload for teachers, including marking exam board papers, ensuring consistency in their assessments and of internal quality assurance and appeals.

“There will be a huge amount of work for teachers and senior staff to do in order to ensure fairness. Where do they find that time? Teachers will have to mark additional papers they didn't mark before. The timescale implies that some staff (mainly senior staff and exams officers) will be working for virtually the entire summer holidays to sort out appeals - many of these will also involve teachers. It's be a long year for many staff already - we've been expected to work in many of our holidays already. This is just adding to workload. We do recognise that we need to get pupils qualifications though and want to support that - so many teachers will end up working long hours again through the summer.” (SLT – Senior leadership team)

While most teachers believed that they already had sufficient evidence of most students' performance, concerns were raised about the lack of evidence from students who have been absent for extended periods.

“Relying on work completed in lockdown is often not beneficial to those students who are young carers or disadvantaged in terms of support at home or limited access to a device or the internet.” (SLT - Senior leadership team)

Many respondents suggested that the disruption since March 2020 would make it more difficult for teachers to put forward grades in summer 2021 than it was in 2020.

Teachers and senior leadership teams raised concerns about the workload involved in appeals. They often cited the difficulties in challenging or defending the initial grades awarded to some students in summer 2020 and frequently linked this to concerns about grade inflation arising from other centres taking a less robust approach.

“Schools and teachers will use whatever evidence shows their students in the best possible light, contributing to unjustifiable levels of grade inflation, destabilising the whole system.” (SLT - Senior leadership team)

In the most extreme cases, responses raised concerns about the potential for grievances or even legal action to be taken against them and the impact on morale and mental health.

“Exam boards must be taking part in the assessment and regulation as much as possible. Teachers cannot be trusted to not overinflate grades and some centres are doing it more than others so it is not fair.” (Teacher – responding in a personal capacity)

“There is the potential for a significant administrative burden with demands placed on schools to manage and deliver the requirements of the revised approach in a tight time frame. Last year we saw legal challenges to CAGs, particularly at A Level and schools and colleges need to be properly protected from this. The proposals have the potential to greatly increase demands on teachers who have already had to make significant adaptations throughout this time. Although professional and committed, there is a risk that the profession’s morale is undermined by a process that is pressured, has significantly different levels of accountability, and potentially changes the dynamic of the relationship between student and teacher. This could undermine efforts of schools to deliver the recovery curriculum as we begin to move on from the pandemic through the summer.” (School or college)

Timelines

Responses to many questions raised concerns about the proposed timeline. Respondents questioned whether there was enough time to generate sufficient evidence, assess that evidence, carry out internal and external quality assurance, issue results and consider appeals.

“I am concerned by the timescale proposed. It is hard to see how staff will have time to be trained, then administer assessments to students, then mark them, then moderate them, then submit them, then respond to exam boards’ standardisation processes in time for July results day.” (SLT - Senior leadership team)

Despite the high level of support (79%) that results days should be brought forward to enable appeals to be considered, respondents questioned whether the proposal was realistic. They also questioned whether decoupling when a student is informed of their results and universities are informed for the purpose of admission decisions would advantage some students over others who were waiting for their results from other qualifications. This is in the context of 63% of respondents supporting the proposal to decouple.

How grades should be referred to

Respondents used a variety of terms to describe the grades arrived at through teacher assessment. The consultation document referred to ‘teacher assessment’ and ‘teacher grades’ but many respondents believed that it would be better to use

terms such as ‘centre assessment’ and ‘centre grades’ so that individual teachers were not associated with the grades.

The consultation did not ask any questions about the terminology. However, the feedback from the consultation will be taken into account when decisions are made.

“[...] Centre submitted grades should not be labelled as teacher awarded grades when clearly they are not. Any grades that are submitted will have gone through an internal quality assurance process and have been subject to exam board influence due to their input at this stage of the process before they are approved and submitted by the Head of Centre. Teacher awarded grades gives the impression that the grade submitted is simply the responsibility of the teacher who taught each student.” (Exams officer or manager)

“You should not call them teacher assessed grades. They are centre assessed grades.” (Governor)

The standard at which students should be assessed

We proposed that grades should be based on teachers’ assessments of the standard at which their students are performing, and that the grade should indicate the student’s demonstrated knowledge, understanding and skills. We also proposed that teachers should assess students only on the areas of content they have covered.

We were clear that we would not ask teachers to judge the grade a student might have received if they had been able to take their exams (as we asked teachers to do in 2020) or the grade a student might have achieved had the pandemic not occurred.

Responses to question 1 reflected strong support (85%) for our proposal with little opposition (10%). This was reflected across all respondent groups albeit with a lower level of support (63%) from those identifying as awarding bodies or exam boards. The 4 exam boards recognised to offer GCSE, AS and A levels were divided in their responses with 2 neither agreeing nor disagreeing and 2 strongly agreeing.

Respondents referred to this issue when answering questions in other parts of the consultation. Those who expressed concerns about the proposal focused on the need to ensure that grading decisions took into account differential lost learning and that a student’s potential should be factored in.

“Students should be assessed on progress and potential progress that could’ve been made under normal circumstances to get accurate grades.” (Student)

“I think this misses the point that students have been disadvantaged this year and it is not fair to hold them to the precisely the same standards as previous years.” (Teacher – responding in a personal capacity)

Some responses, while noting there are different views, supported the approach and suggested that the group being set up by the government to consider learning loss should consider how students should be supported with their progression, where their grade did not reflect their potential.

Responses to the consultation questions

What the grades will mean

Q1. To what extent do you agree or disagree that the grades awarded to students in 2021 should reflect the standard at which they are performing?

Figure 1: Q1 - overall responses

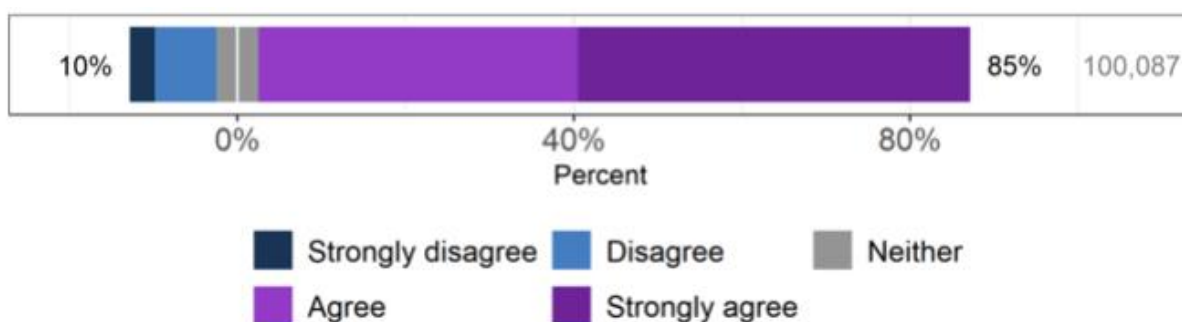


Table 1: Q1 - overall responses

Q1 responses	Count	Percentage
Strongly agree	46,693	47%
Agree	38,084	38%
Neither agree nor disagree	4,988	5%
Disagree	7,296	7%
Strongly disagree	3,026	3%

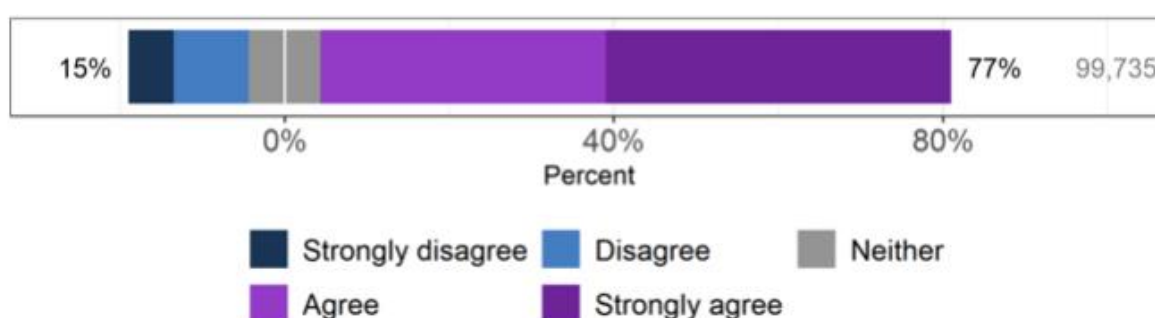
Q1 total responses	100,087
No response	509
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

When teachers should assess the standard at which students are performing

Q2. To what extent do you agree or disagree that the alternative approach to awarding grades in summer 2021 should seek to encourage students to continue to engage with their education for the remainder of the academic year?

Figure 2: Q2 - overall responses



Q2 responses	Count	Percentage
Strongly agree	41,906	42%
Agree	34,540	35%
Neither agree nor disagree	8,699	9%
Disagree	9,139	9%
Strongly disagree	5,451	5%

Q2 total responses	99,735
No response	861
Survey total responses	100,596

Seventy-seven per cent agreed or strongly agreed with the proposal that the arrangements should encourage students to continue to engage with their education for the remainder of the academic year; 15% disagreed or strongly disagreed.

Teachers, senior leadership teams, exams officers and managers and awarding organisation employees all had a similar pattern of agreement strongly in favour of

the proposals with over 90% in favour/strongly in favour. The agreement rate for students and employers was lower, at 63% and 44% respectively.

Many respondents felt strongly that students should have the opportunity to complete their courses to support them in their next steps.

“We have significant concerns about the impact of learning lost by pupils this year and the preceding year as a result of the pandemic. The agreed approach should ensure that students are engaged in their learning for as long as possible for the remainder of the academic year, covering as much of the course content as is possible during this year, in order to help them with the understanding and skills required for their next steps at both post-16 and post-18...” (University or higher education institution)

“Students should be motivated to learn for as long as possible, therefore final assessments should be made as late in the summer term as possible...” (Other representative or interest group)

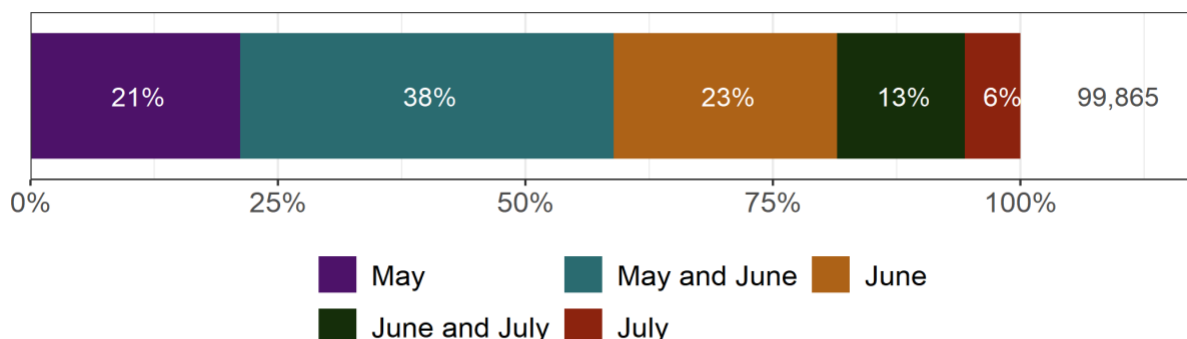
“It is imperative that students continue to engage with their education until the time when they would usually cease attending lessons in school. Education is about more than just the final result and this will ensure students are better prepared for their next steps especially if they are continuing in education...” (SLT - Senior leadership team)

Those who were not in favour of the proposal felt that students should finish earlier and be free to move on as soon as possible.

“The earlier the grades are given, the more certainty students can have in these tumultuous times and allow for alternative arrangements such as college and sixth form which may well take more time given current circumstances.” (Student)

Q3. When would you prefer that teachers make their final assessment of their students' performance?

Figure 3: Q3 - overall responses



Q3 responses	Count	Percentage
May	21,161	21%
May and June	37,696	38%
June	22,563	23%
June and July	12,848	13%
July	5,597	6%

Q3 total responses	99,865
No response	731
Survey total responses	100,596

Thirty-eight per cent of respondents selected May and June as the preferred time for teachers to make their final assessments, making this the most popular option. The exam boards favoured May and June although other awarding organisations favoured May. Forty-four per cent of employers also preferred May.

Teachers, parents, senior leadership teams and exams officers generally preferred May and June, with the second most popular choice being June. Students generally preferred May and June with May being the second most popular time.

Many respondents commented that having assessments in May and June would provide the best balance between students preparing for assessments, ensuring enough time to mark and moderate results and students to progress. Some

respondents were keen that the assessment period was kept 'as normal' as possible for all – May and June.

"As close as possible to normal exam time so that the organisation and awarding of grades can fit in, as much as possible, with a normal calendar."
(Teacher - responding in a personal capacity)

"Being assessed when their exams were supposed to happen will give more of a structure to the education they receive and make it more likely that they complete their courses in time." (Student)

"We would prefer students to be assessed in the same time window as exams are normally conducted. This would still leave time within the academic year for end of year assessments for other year groups after the Year 11 and 13 assessments have been completed..." (Academy chain)

A minority of respondents would prefer assessments to take place later than usual, towards the very end of the academic year, to ensure students have the chance to prepare, show progress and for teachers to gather evidence.

"At the latest point possible so there is time to finish the course and really understand what we have learnt." (Student)

"Given that this year's students are at a disadvantage because of all the schooling they have missed, and in order to give them as much time as possible to improve their skills, I believe students should be assessed as late as possible, ie, in July." (Parent or carer)

"Students should be assessed later to allow the course content to be covered in full..." (Teacher - responding in a personal capacity)

Some respondents explained that they would prefer assessments to take place earlier than usual, including to reduce anxiety and uncertainty. Some of those preferring an earlier assessment period also said that this would allow more time for marking, moderation and appeals to be completed.

"Students should be assessed as early as possible, May at the latest. This level of uncertainty and the unnecessary suspense adds to lots of students' anxiety and puts them under more stress." (SLT – Senior leadership team)

“Students should be assessed ASAP before the end of the academic year to allow for the usual level of moderation, standardisation and external marking wherever necessary...” (Teacher - responding in a personal capacity)

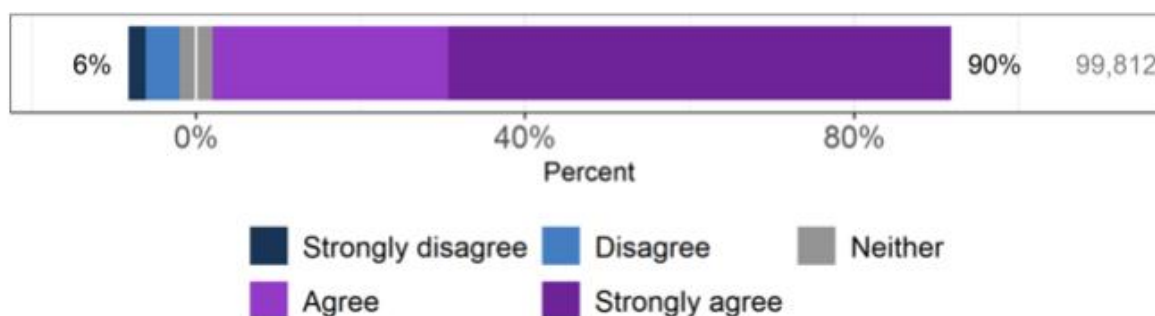
Some respondents specifically stated that assessments should start as soon as possible, or as soon as schools and colleges return.

There were also respondents from independent, international and other schools who asked to take into account the different end of term dates in any time periods used.

“Students should be assessed at a point when as many of them as possible are back in school. Bearing in mind that many independent schools, and some LEAs, break up in late June or early July the assessment window, grade input and appeals process should not make teachers and exams officers work in their summer break.” (Teacher - responding in a personal capacity)

Q4. To what extent do you agree or disagree that teachers should be able to use evidence of the standard of a student’s performance from throughout their course?

Figure 4: Q4 - overall responses



Q4 responses	Count	Percentage
Strongly agree	61,041	61%
Agree	28,542	29%
Neither agree nor disagree	4,079	4%
Disagree	4,090	4%
Strongly disagree	2,060	2%

Q4 total responses	99,812
No response	784
Survey total responses	100,596

There was very strong agreement for teachers being able to use evidence of the standard of a student's performance from throughout their course. Ninety per cent of respondents agreed or strongly agreed, whereas just 6% disagreed or strongly disagreed. The pattern of responses to this question was consistent across all groups. Although private, home-educated students were in favour of the proposal overall, they had the lowest level of agreement at 72%.

Many commented that this would give teachers a more representative picture of how students were performing, frequently citing the amount of face-to-face education missed, difficulties with remote learning and the emotional impact of the pandemic.

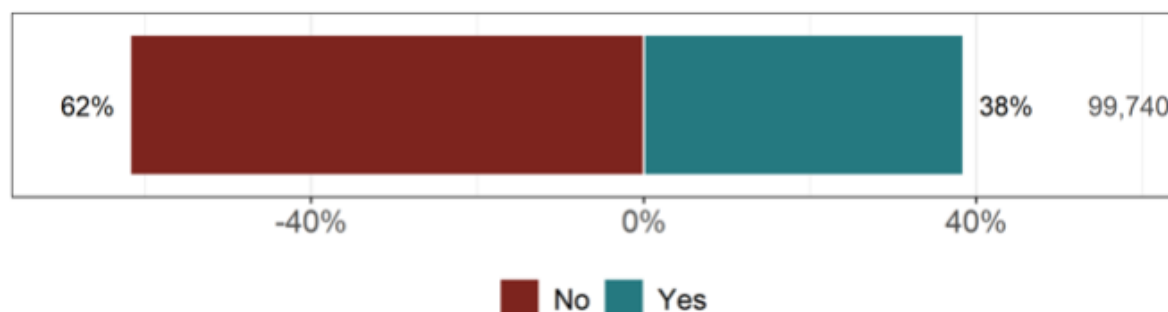
“I think the timescale proposals are good and that teachers should be able to pull evidence from the past 2 years when A levels or GCSEs were studied. This evidence period should then cover students who have been more recently absent/ isolating or affected by not being able to learn from home as well as those whose performance improves during studies.” (Parent or carer)

“I think students should be assessed throughout the year as this can have a breadth of evidence of the students' performance and creates fairness with students' grades.” (Examiner)

Some respondents stated that although work should be taken from a wide time span, there should be careful use of work completed out of school or college. There was also the view that less weight should be given to earlier work due to progress made throughout a course. Some respondents suggested that importance should be attached to particular types of evidence, such as mock exams, coursework or non-exam assessment. Others felt all evidence should be considered from a wide time period including homework, attendance and attitude to learning. This is discussed in detail under questions 19 and 24.

Q5. Should there be any limit on the period from which previous work could be drawn?

Figure 5: Q5 - overall responses



Q5 Responses	Count	Percentage
Yes	38,224	38%
No	61,516	62%

Q5 total responses	99,740
<i>No response</i>	856
Survey total responses	100,596

Sixty-two per cent of respondents said no, stating there should not be a limit on the period from which previous work can be drawn and 38% said yes, there should be a time limit. Students and parents and carers were the most opposed to any limit – in each of these two groups over 60% said no to any time limit. All other groups who responded, including both those in a personal and an official capacity, demonstrated a rate of agreement and disagreement that was broadly equal.

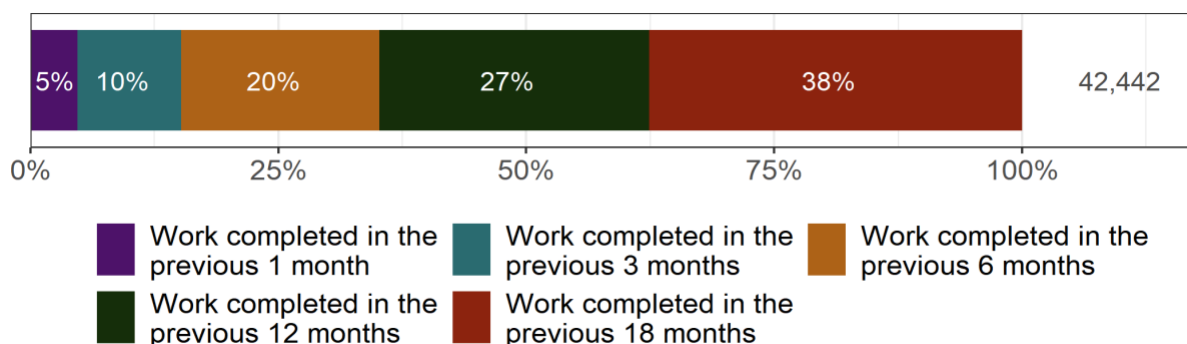
The responses to this question frequently overlapped with those to question 4 discussing the use of evidence from throughout the course. Many respondents stated that there should not be a time limit and evidence should be considered from the start of the course.

“A limited period would prevent teachers being able to draw on evidence such as timed independent assessments and mock examinations from earlier in the course. (Local authority)

“Evidence should be taken from the key stage in which the learner is studying, and preferably the year in which they are studying. However, it would be wrong to rule out evidence from earlier where it shows relevant performance at a standard that can inform a teacher’s final judgement.” (Awarding body or exam board)

Q6. If you answered ‘yes’, what should that limit be?

Figure 6: Q6 - overall responses



Q6 responses	Count	Percentage
Work completed in the previous 1 month	2,028	5%
Work completed in the previous 3 months	4,428	10%
Work completed in the previous 6 months	8,485	20%
Work completed in the previous 12 months	11,531	27%
Work completed in the previous 18 months	15,970	38%

Q6 total responses	42,442
No response	58,154
Survey total responses	100,596

Thirty-eight per cent of respondents believed that evidence should come from work completed in the previous 18 months. Most groups had a similar pattern of agreement except for private, home-educated students where 27% preferred a 6-month period and the rest of their responses were spread across the other options. Fifty-seven per cent of employers also preferred a 6-month period. Many respondents said allowing a wide time period would enable teachers to have as much evidence as possible and account for the more recent disruption.

“Teachers should assess students based on their work throughout the previous 18 months to take account of the many weeks and months of disruption they have endured...” (Parent or carer)

“Grades should be compiled from as much data as possible spanning across a good time interval to ensure fair allocation.” (Student)

Some respondents suggested that work produced when schools and colleges were mainly closed should not be used. They felt this evidence was not most representative of a student’s abilities and in some cases was hard to verify.

“I think particular attention should be paid to student performance not impacted by lockdown, ie, learning during school attendance. Obviously, schools have provided very different learning experiences for students (especially lockdown 1 when there was no notice).” (Parent or carer)

“A key concern is that evidence used is work completed under supervision at school and not via online home schooling. Experience shows some students use outside resources to complete tests at home to improve scores and some do not.” (Parent or carer)

“For some students, work completed in lockdowns may reflect their home situation more than their ability. Therefore, work completed at home should be used with teacher discretion as they will know the students best.” (Teacher - responding in a personal capacity)

Some respondents suggested that evidence should come from a more recent time period to recognise how students progress during the course.

“Assessment should be based on the final year of study and possibly only the last 6 months so that their actual level of achievement is evidenced.” (Other representative or interest group)

“Students should be assessed based on their most recent performances, as some students improve over time. Hence, latest performance should be evaluated.” (Student)

Teachers of more practical subjects such as PE, textiles, music and design technology requested that a decision on any time period takes into account some of the difficulties faced in completing non-exam assessment.

Q7. Do you have any comments on when students should be assessed?

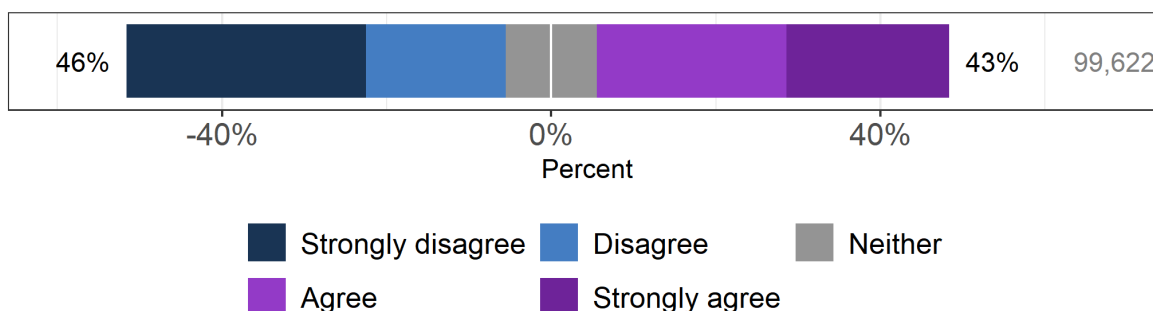
There were 40,848 comments relating to questions 2, 3, 4, 5 and 6, which we have summarised under those questions

Many respondents stated that they would prefer teacher assessments (rather than exams) although this was referred to in different ways. Some respondents stated they would prefer teacher assessments to be taken from throughout the course, whereas some referred to smaller assessments during a smaller assessment window.

How teachers should determine the grades they submit to exam boards

Q8. To what extent do you agree or disagree that the exam boards should provide a set of papers to support teachers in assessing their students' work?

Figure 7: Q8 - overall responses



Q8 responses	Count	Percentage
Strongly agree	19,722	20%
Agree	22,972	23%
Neither agree nor disagree	11,041	11%
Disagree	16,891	17%
Strongly disagree	28,996	29%

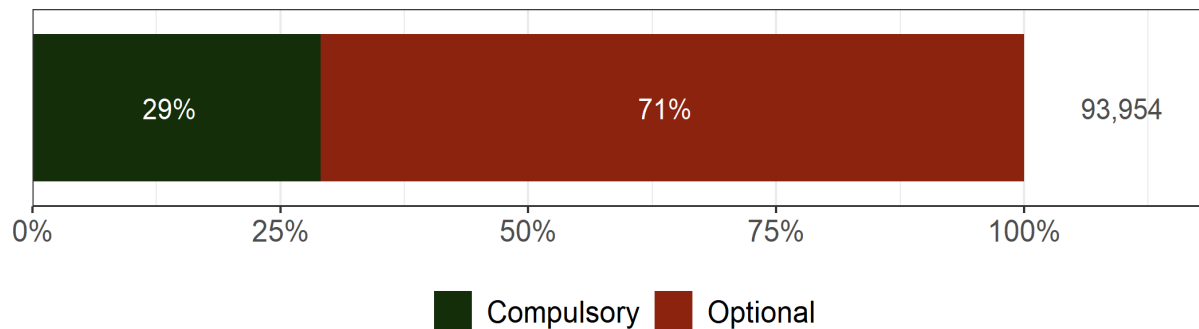
Q8 total responses	99,622
No response	974
Survey total responses	100,596

Views on the use of exam board papers varied by group, for example, 51% of parents and carers agreed or strongly agreed that exam board papers should be provided, as did 69% of teachers and 72% of senior leaders, whereas 62% of students disagreed or strongly disagreed.

Q9. Do you think the use of the papers provided by the exam boards should be compulsory or optional, for GCSEs, AS and A levels?

Q9.1 Do you think the use of the papers provided by the exam board should be compulsory or optional for A level?

Figure 8: Q9.1 - overall responses

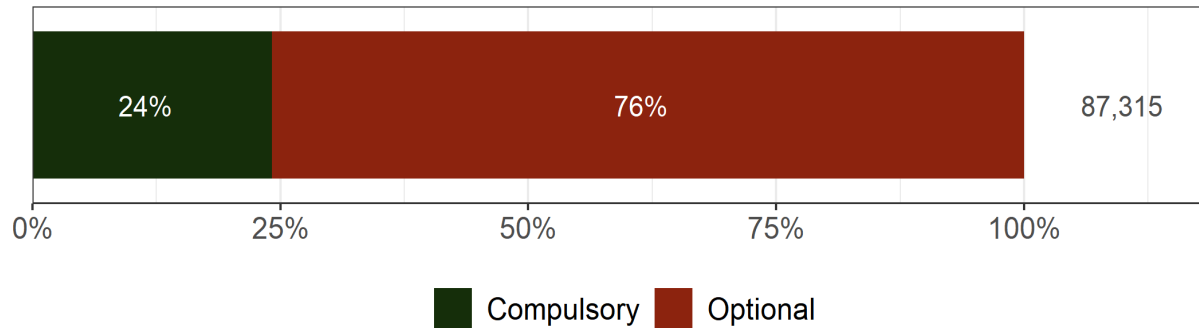


Q9.1 responses	Count	Percentage
Compulsory	27,295	29%
Optional	66,659	71%

Q9.1 total responses	93,954
No response	6,642
Survey total responses	100,596

Q9.2 Do you think the use of the papers provided by the exam board should be compulsory or optional for AS?

Figure 9: Q9.2 - overall responses

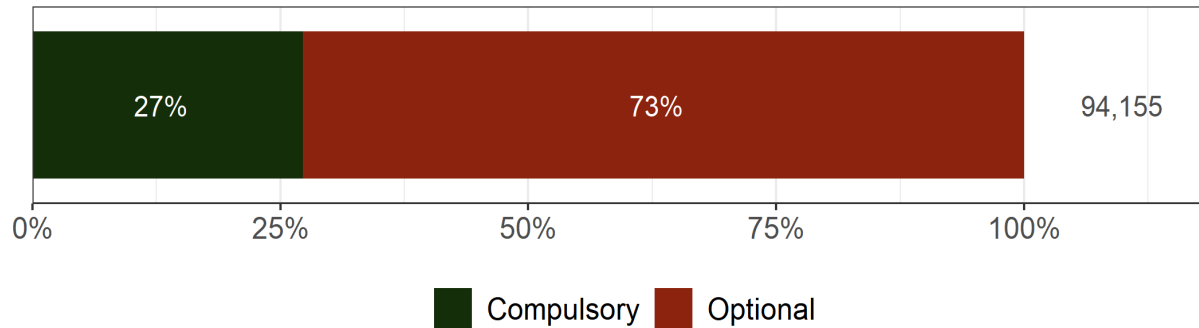


Q9.2 responses	Count	Percentage
Compulsory	21,114	24%
Optional	66,201	76%

Q9.2 total responses	87,315
No response	13,281
Survey total responses	100,596

Q9.3 Do you think the use of the papers provided by the exam board should be compulsory or optional for GCSE?

Figure 10: Q9.3 - overall responses

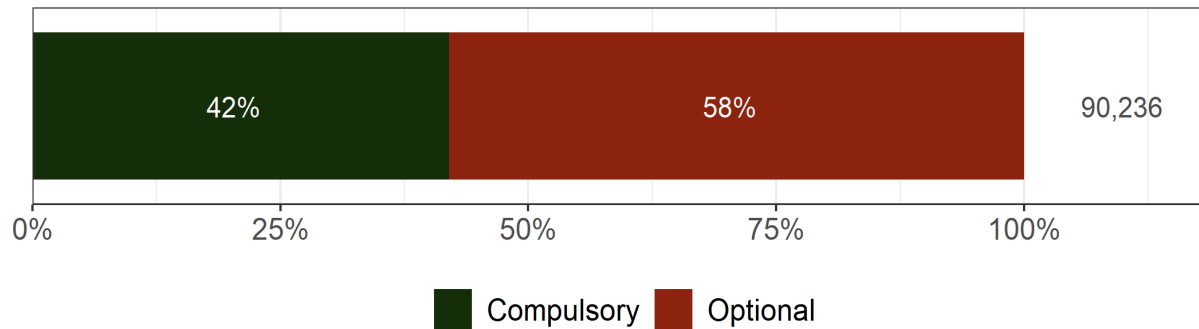


Q9.3 responses	Count	Percentage
Compulsory	25,691	27%
Optional	68,464	73%

Q9.3 total responses	94,155
No response	6,441
Survey total responses	100,596

Q9.4 Do you think the use of the papers provided by the exam board should be compulsory or optional for GCSE English language?

Figure 11: Q9.4 - overall responses

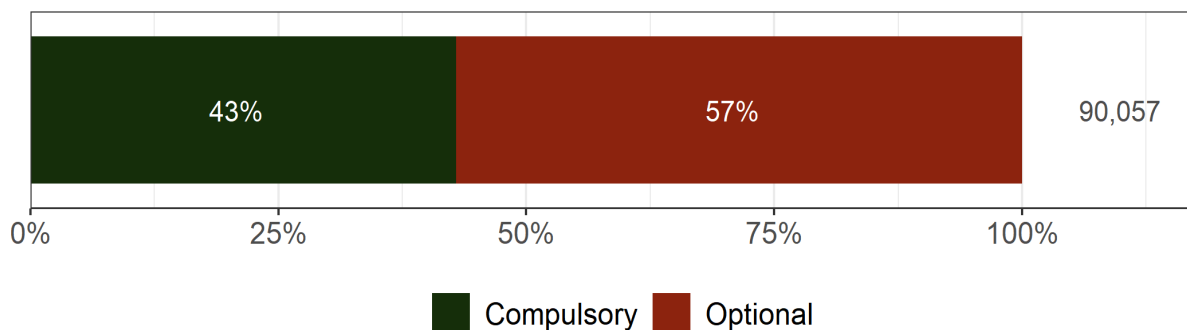


Q9.4 responses	Count	Percentage
Compulsory	37,902	42%
Optional	52,334	58%

Q9.4 total responses	90,236
No response	10,360
Survey total responses	100,596

Q9.5 Do you think the use of the papers provided by the exam board should be compulsory or optional for GCSE mathematics?

Figure 12: Q9.5 - overall responses



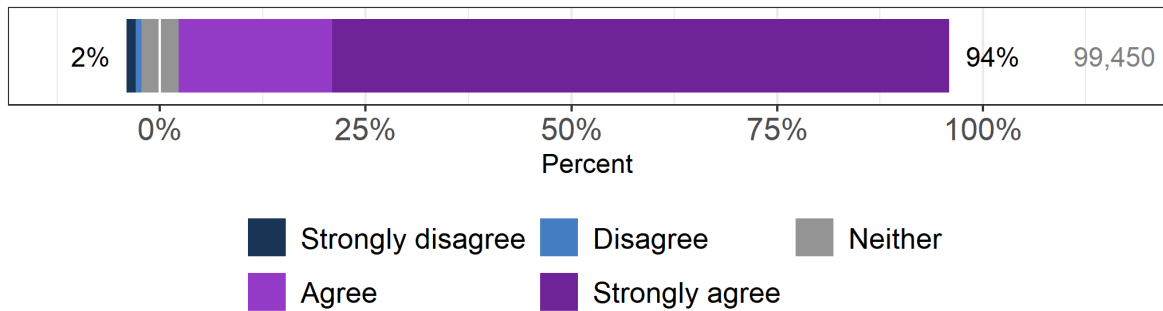
Q9.5 responses	Count	Percentage
Compulsory	38,662	43%
Optional	51,395	57%

Q9.5 total responses	90,057
No response	10,539
Survey total responses	100,596

Teachers, senior leadership team, examiners and exams officers or managers were the groups most in favour of exam board papers at all levels being compulsory. Students and employers were the groups least in favour of exam board papers at all levels being compulsory.

Q10. To what extent do you agree or disagree that any papers provided by the exam boards should include questions that are of a type that is familiar to students?

Figure 13: Q10 - overall responses



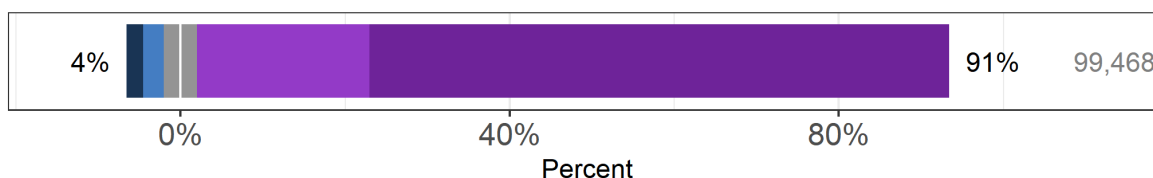
Q10 responses	Count	Percentage
Strongly agree	74,565	75%
Agree	28,618	19%
Neither agree nor disagree	4,459	4%
Disagree	672	1%
Strongly disagree	1,137	1%

Q10 total responses	99,450
No response	1,146
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q11. To what extent do you agree or disagree that if teachers use exam board papers they should have choice about the topics covered in the questions their students answer, for example through choice of which papers they use with their students from the set of papers provided?

Figure 14: Q11 - overall responses



Strongly disagree
 Disagree
 Neither
 Agree
 Strongly agree

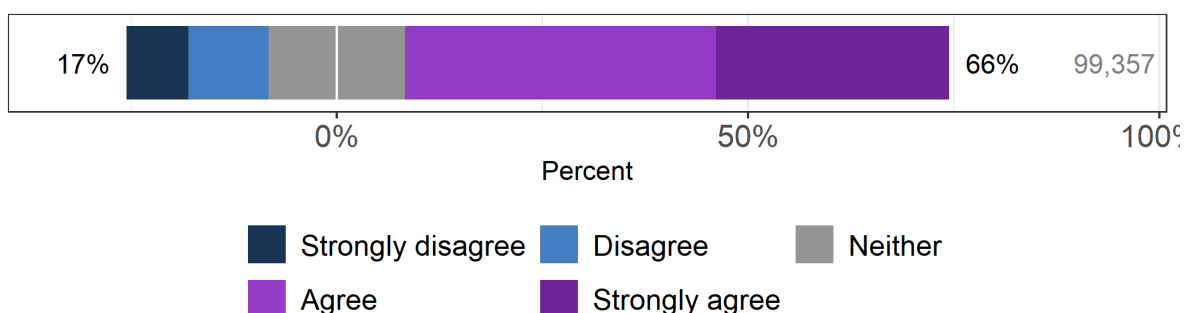
Q11 responses	Count	Percentage
Strongly agree	70,123	70%
Agree	20,794	21%
Neither agree nor disagree	4,042	4%
Disagree	2,468	2%
Strongly disagree	2,041	2%

Q11 total responses	99,468
<i>No response</i>	1,128
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q12. To what extent do you agree or disagree that teachers should be required to assess (either by use of the exam board papers or via other evidence) a certain minimum proportion of the overall subject content, for each subject?

Figure 15: Q12 - overall responses



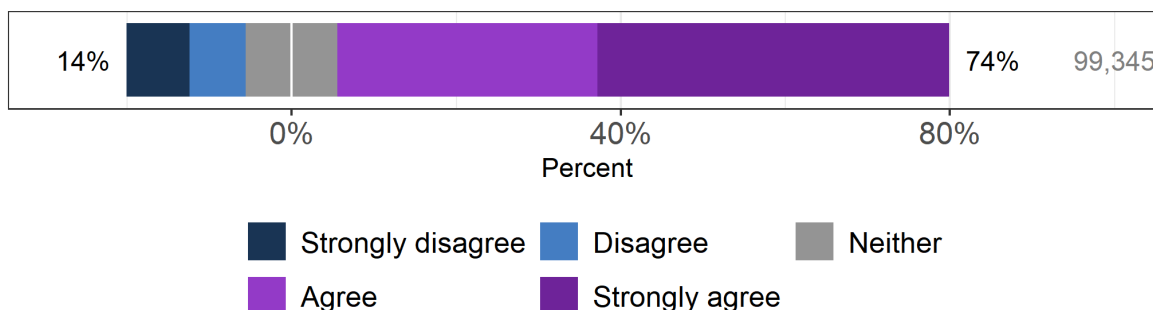
Q12 responses	Count	Percentage
Strongly agree	28,154	28%
Agree	37,591	38%
Neither agree nor disagree	16,492	17%
Disagree	9,643	10%
Strongly disagree	7,477	8%

Q12 total responses	99,357
No response	1,239
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q13. To what extent do you agree or disagree that teachers should mark any papers their students are asked to complete?

Figure 16: Q13 - overall responses



Q13 responses	Count	Percentage
Strongly agree	42,529	43%
Agree	31,345	32%
Neither agree nor disagree	11,068	11%
Disagree	6,827	7%
Strongly disagree	7,576	8%

Q13 total responses	99,345
No response	1,251
Survey total responses	100,596

Students generally supported teacher marking of exam board papers with 82% either agreeing or strongly agreeing. Teachers and senior leaders were less supportive with 47% and 49% agreeing or strongly agreeing respectively.

Q14. Do you have any comments on the use of exam board papers?

We received 52,978 comments in response to this question.

Many students commented that as exams have been cancelled, they should not be assessed using papers provided by exam boards, for which they would have to prepare. Many respondents suggested that if exams would be unfair then so too would be assessment using exam board papers.

“As exams have been cancelled then there should not be any further exams for students.” (Parent or carer)

“We are concerned about the impact on disadvantaged students were exam board papers to be used. We are concerned that any exam-style assessment will highlight the learning lost by students who need more support in school, have a home environment that's more challenging for home learning, have parents who are unable to support, don't have access to tech for learning, and whose school has done less to keep learning going throughout 12 months of disrupted learning.” (Other representative or interest group)

“I don't think it's fair to cancel exams then make us do other exams as different people have learnt different topics.” (Student)

“We believe that this approach to exam papers and assessments will not benefit all students. Students have now heard the message that their exams are cancelled for 2021, and this would be felt to be backtracking on that promise to them, which could have a significant and serious impact on students' mental health.” (Other representative or interest group)

Some argued in support of the provision and use of exam board papers on the basis that they would:

- provide robust evidence and support teachers explain and defend their decisions
- provide some consistency between schools and colleges
- help teachers apply a consistent standard
- help private candidates to get a grade

“We strongly agree that exam boards should provide a set of papers to support teachers in assessing their students. To enable teachers to assess their students’ work there would also need to be substantial guidance to accompany these papers, as the papers alone will not allow teachers to assess their students’ work.” (Awarding body or exam board)

“They would be useful to ensure some parity and therefore equality between schools and exam centres, as teacher assessment could otherwise be seen as highly subjective.” (Student)

“Exam board papers are needed to give a common platform of assessing grades across schools and authorities.” (Parent or carer)

“Exam board papers will help protect teachers from complaints directed towards them personally.” (School or college)

“If used, then that would create a fairer national standard.” (SLT – Senior leadership team)

Other views on exam board papers included that:

- the use of exam board papers will only be fair if it is compulsory
- exam board papers should be optional, part of a regular set of assessment activities, if needed
- the final grade should not be based on the grade from the exam board paper alone
- they could be offered to students who are not happy with a provisional grade given to them by their teacher as an opportunity to improve

“They should provide only 'some' basis of the final part of the GCSE grade, but not all of it. Students have learned different content to a differing depth and thus should not be relied upon as the sole basis for the grade. They should be used as evidence to support a grade only.” (Parent or carer)

“The use of papers should be compulsory with a choice of papers to recognise learning loss and different patterns of specification coverage.” (School or college)

“The papers should not be compulsory. If made compulsory the papers would create a new 2021 examination series.” (Other representative or interest group)

“These external papers should be split up into topics. With a range of papers, teachers can choose from and select ones which are appropriate for their students to take, based on the topics they have covered. I don’t think these external papers should solely be used for a student’s grade as it may not reflect how they have worked throughout the course.” (Student)

Some respondents suggested that exam board papers should be compulsory for GCSE English language and mathematics because these qualifications are important for progression.

“Feels more realistic to only do this in maths and English and leave other subjects just to teacher assessed grades.” (Parent or carer)

“There has to be some form of standardisation across all students but many have missed curriculum time. A Maths and English paper that is provided and marked by exam boards would help moderate grades, help students progress on the appropriate pathway.” (SLT – Senior leadership team)

“I believe exam board paper may be necessary for GCSE maths and English seeing as you have to pass those to get in to most things currently.” (Student)

Many respondents, from all groups, were concerned that students’ mental health would be negatively affected if they had to take exam board-provided papers.

“The use of exam board papers is very unfair on students as they have missed out on a large portion of their education due to COVID and putting them in this situation puts a huge strain on students’ mental health as well as the fact that they are unable to properly revise for these exams especially if working in their home environment is very difficult.” (Student)

“This is causing a great deal of anxiety amongst my pupils who feel that this is an ‘exam by the back door’. Whilst I support the provision and use of papers for optional use by teachers for guidance, it runs the risk that some centres will create a frenzy of expectation around these papers, with an over-emphasis on how important they are, creating poor outcomes in many teenagers who are

already experiencing poorer mental health because of the pandemic and disruption to their education.” (Teacher – responding in a personal capacity)

“There has been a sharp increase in students suffering from mental health issues since the start of the pandemic. Basing the entire grade on one set of exam papers would put too much pressure on many fragile students.” (Teacher – responding in a personal capacity)

Whilst there was strong support (75%) for teachers to mark exam board papers, both those who were in support or against the proposal, went on to raise a number of issues including that:

- teacher workload has increased due to the pandemic and the marking of exam board papers would be an unreasonable addition to this it would be difficult to train and standardise teacher marking to ensure consistency across the country
- exam board marking would protect against teacher bias
- new teachers would find it difficult to mark the papers
- teachers should be paid for marking the exam board papers
- in a normal year, the exam boards recruit, train and pay examiners, many of whom are teachers who choose to perform this task, and this is the only feasible way for exam board paper marking to take place

“These should absolutely not be marked by teachers. It would be an unacceptable workload unless they are permitted to stop teaching other year groups for a period of time.” (SLT – Senior leadership team)

“The current suggestions add considerably to teacher workload. Teachers will need to be given time if they are marking additionally, assessing, learning to assess, moderating, standardising.” (Other representative or interest group)

“Centres/teachers marking and moderating papers from their own students would allow them to rapidly record the students' attainment and make informed decisions about their teacher assessed grades. However, an element of national moderation would standardise marking and promote fairness in the teacher assessed grades.” (Teacher – responding in a personal capacity)

“Teachers should not mark their students' exams due to inherent biases they may have which could penalise some students and not others due to discrimination or favouritism.” (Other representative or interest group)

“Teachers should absolutely not be required to mark exam-style papers for free when many of us work as examiners.” (SLT – Senior leadership team)

The method of determining the content of exam board papers was the focus of many comments, including that:

- teachers should be able to choose what content will be assessed, to take account of their students' lost learning
- students should only be assessed on content that they have covered
- students should be told what is on the exam board paper and/or it should be open book
- there should be a bank of questions from which teachers would choose

“If these exam board papers are used I believe they should be open book.”
(Parent or carer)

“Papers should have sections and one section must be completed from the sections available to ensure the students are tested on content they have been taught.” (Teacher – responding in a personal capacity)

“We also welcome Ofqual's proposal that teachers should be able to choose from a set of shorter papers, based on topics, to allow teachers options to take account of content that has not been fully taught due to the disruption. To account for learning loss and allow students to display their potential more fully, it is important that papers are flexible and set with a wide range of topics.” (Other representative or interest group)

“Exam boards should produce a range of sample papers and/or banks of questions, with accompanying mark schemes, which schools and colleges should be encouraged to use to ensure their submitted grades are as robust, reliable and consistent with those submitted by other centres as possible. Papers/questions should be included on a wide range of content from the specification, so that centres can choose those which focus on content which their students have been

taught, however disrupted their learning has been.” (Other representative or interest group)

“It would be easier to standardise across the country, however teachers should choose the topics in each exam. I suggest that the exam boards provide an exam for all the sections possible, but the teachers choose which ones to add.” (Student)

“We think it is likely that teachers would most prefer a bank of questions, organised by topic, with which they could create their own papers – just as they already do for mock exams and practice papers using exam boards’ own services.” (Awarding body or exam board)

Some respondents commented that it would not be appropriate to use past question papers as they may or may not have been used in teaching and learning.

“Papers must resemble something teachers and students have seen before, but not be past papers as many schools will already have used them.” (Governor)

“Questions should be new, not from past papers. It should assess student ability, not memory of past mark schemes.” (Parent or carer)

“Past papers are not viable as some students may have seen all the past papers available to staff, and some not. Past papers in the public domain with already published marks schemes cannot be used.” (School or college)

“The exam board papers should not be based on past papers - teachers will have already used these.” (Teacher – responding in a personal capacity)

In contrast, arguments in favour of the use of questions from past papers, including some put forward by exam boards included:

- they would allow the exam boards to provide guidance to teachers about the marking standard
- the mark schemes are comprehensive having been used for live assessment and would indicate when it is appropriate to reward partially correct responses

- standardisation materials, such as those provided to train examiners, could be made available to teachers to help with consistency in the marking
- this would reduce the burden on the exam boards as they would not then be required to produce new assessment material in a short space of time for all qualifications

“These should be made up of material taken from past papers. This is because past papers are the only material where exam boards can provide guidance to teachers about the marking standard (derived from past standardisation activities, exemplar scripts etc).” (Awarding body or exam board)

“Using past papers would aid understanding of the performance level of each candidate to contribute to their teacher assessed grade.” (Awarding body or exam board)

Other concerns about the use of exam board papers included that:

- it may not be possible to administer exam board papers in a secure way to ensure that students do not have access to inappropriate support
- questions will be leaked if exam board papers are available in advance
- if teachers have a choice, they could construct papers to avoid difficult topics, focus on recall, not be comparable between centres and teachers could prepare students directly for the paper

“If papers are used, it needs to be ensured that these are kept secure to keep the grading system fair. Too often papers are leaked or model solutions of previous papers are put online for students to access which would give students advantages over others. This would mean that students would need to sit the assessments at the same time too, which brings complications due to isolation.” (Teacher – responding in a personal capacity)

“Exam papers should be sat in a controlled environment. My daughter sat her year 10 exams online. Parents were asked to invigilate their children to make sure they didn’t cheat and this I did, but some children revealed to my daughter that they completed the exams as ‘open book’ tests. Only a controlled environment will ensure that some children don’t cheat.” (Parent or carer)

“It would be useful to have an objective measure but this will only be valid if undertaken in school, under exam conditions which not all students will be able to

do. Therefore they should not be compulsory as this will disadvantage students.”
(SLT – Senior leadership team)

Respondents who supported the assessment of a certain minimum proportion of the overall subject content frequently commented that this should be a low proportion in order to take into consideration the different levels of disruption that students have experienced to their education. Other comments used this reason to explain that it would not be fair to set a minimum proportion of content that should be assessed.

“Need to be aware that there are students who have been significantly affected during the Autumn Term through bubble closures so setting a minimum amount to cover is not fair.” (SLT – Senior leadership team)

“There should be a minimum amount of content covered but this should be lenient due to the time missed.” (Student)

“I think that there cannot be a minimum amount of content for each subject, due to the extreme diversity in the disruption caused.” (Student)

“I think that there could be a minimum proportion that should be assessed by exam board papers, say 50%, but not much higher.” (Teacher – responding in a personal capacity)

“Teachers should select a minimum range of topic tests that would ensure adequate coverage of the specification but would simultaneously provide some flexibility to focus more on topics the students had studied.” (SLT – Senior leadership team)

Finally, some respondents commented that the determining of a final grade for a student should be left to the teacher’s professional judgement, with the option to use materials provided by the exam boards alongside other evidence.

“Optional papers produced by the awarding bodies will provide helpful support for standardisation. However, they should be used only to help teachers make decisions (ie, as part of the teacher’s judgement process). How they are used should not be mandated, as they might provide limited useful evidence given the unusual circumstances under which they may have been taken, and they must not ‘trump’ teacher judgement, otherwise we will see a huge number of appeals.”
(Other representative or interest group)

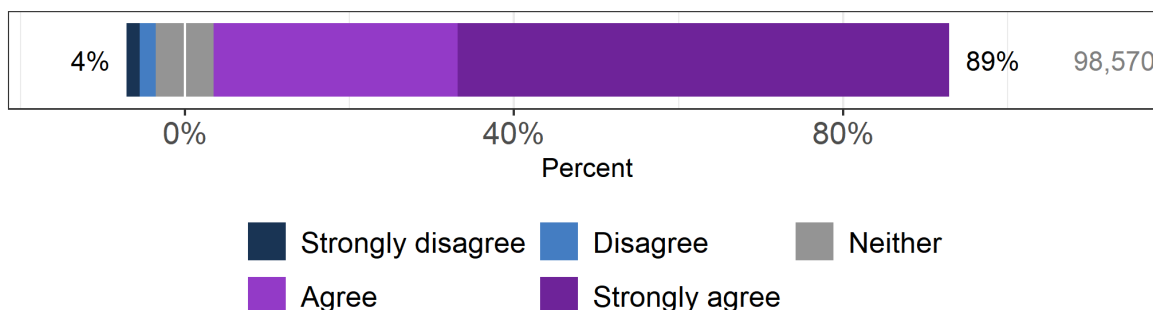
“We think that exam board papers should be provided as an optional part of the evidence base.” (Academy chain)

“There will still be a huge gap between schools accessing the papers in areas not impacted as much by Covid to those that have. Similarly, disadvantaged pupils, including those without access to technology during lockdown, are still at a huge advantage. Trust teachers to give an assessment on holistic measures, pupils will know they still have to complete their education if the grade is awarded by teachers towards the end of the school year.” (Teacher – responding in a personal capacity)

“There are two possible uses for such papers. 1. To assist teachers in making objective assessment of pupils' performance 2. To inject a degree of consistency between centres and act as an anchor on the system. Both of these are useful and arguably essential.” (Other representative or interest group)

Q15. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in full for a subject?

Figure 17: Q15 - overall responses



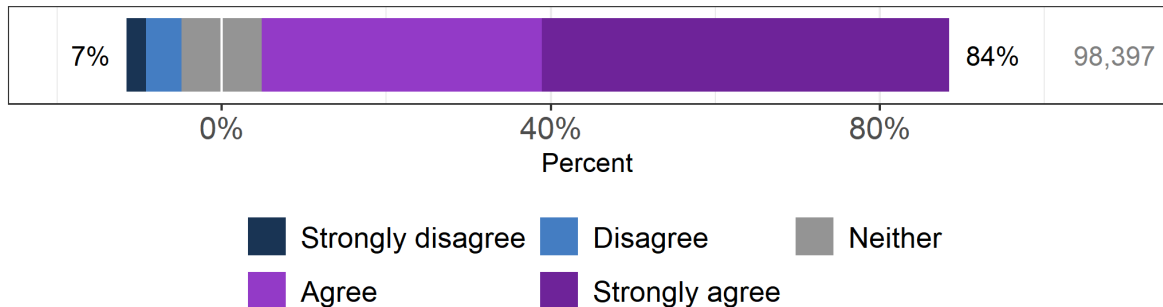
Q15 responses	Count	Percentage
Strongly agree	58,916	60%
Agree	29,195	30%
Neither agree nor disagree	6,938	7%
Disagree	1,946	2%
Strongly disagree	1,575	2%

Q15 total responses	98,570
No response	2,026
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q16. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in part for a subject?

Figure 18: Q16 - overall responses



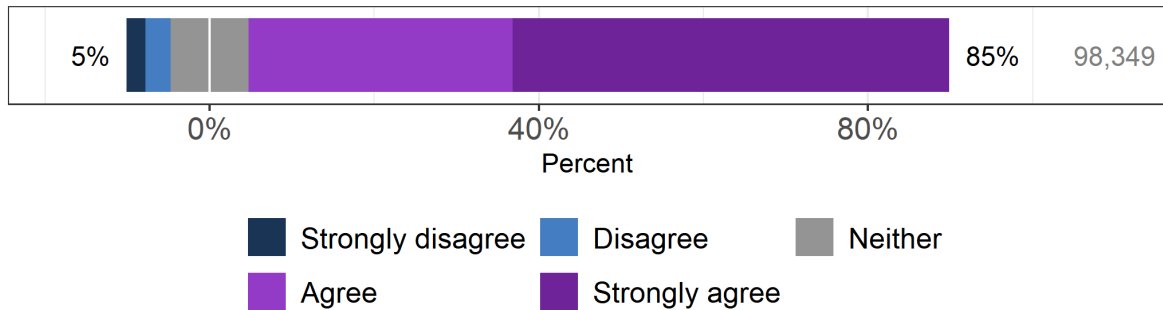
Q16 responses	Count	Percentage
Strongly agree	48,716	50%
Agree	33,488	34%
Neither agree nor disagree	9,649	10%
Disagree	4,223	4%
Strongly disagree	2,321	2%

Q16 total responses	98,397
No response	2,199
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q17. To what extent do you agree or disagree that teachers should mark their students' non-exam assessments?

Figure 19: Q17 - overall responses



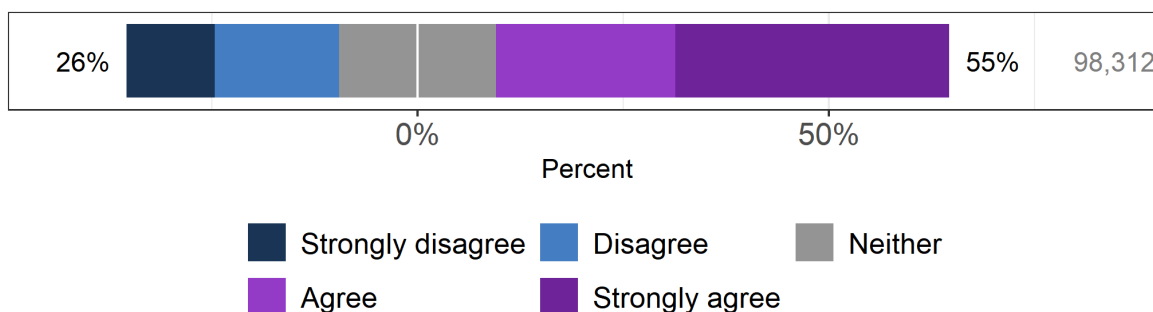
Q17 responses	Count	Percentage
Strongly agree	52,221	53%
Agree	31,528	32%
Neither agree nor disagree	9,327	9%
Disagree	3,015	3%
Strongly disagree	2,258	2%

Q17 total responses	98,349
No response	2,247
Survey total responses	100,596

Seventy-seven per cent of teachers were in favour of teachers marking the non-exam assessments.

Q18. To what extent do you agree or disagree that the marking of non-exam assessments should not be moderated by the exam boards this year?

Figure 20: Q18 - overall responses



Q18 responses	Count	Percentage
Strongly agree	32,754	33%
Agree	21,399	22%
Neither agree nor disagree	18,777	19%
Disagree	14,855	15%
Strongly disagree	10,527	11%

Q18 total responses	98,312
<i>No response</i>	2,284
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q19. Do you have any comments on the use of non-exam assessment and separately reported results and grades?

We received 25,194 comments in response to this question.

Many respondents commented that students had worked hard on their non-exam assessments and that it would provide concrete evidence of a student's performance.

"The NEA is an important element that students have worked hard on and deserve the recognition of this effort." (Teacher – responding in a personal capacity)

"Students will have still worked hard towards these non-exam assessments and coursework believing they will be considered as they usually would towards their end grade. It gives a good indication of a student's ability and knowledge of a subject without need for exams. Leaving this out of final grades I believe would be a huge blow to many." (Student)

"Non-exam assessment and particularly coursework which is part of the standard assessment for a number of A Level and GCSE subjects provides robust evidence to support decision making on grading." (University or higher education institution)

Respondents expressed a range of opinions about how the pandemic has affected students' progress with their NEA including that:

- students should not be penalised because they have not been able to access specialist rooms and equipment
- students should be credited for what they have done, and teachers should take into account what has been completed and mark accordingly
- NEA work should not be considered as there will be different levels of completion
- exam boards should provide guidance as to how to account for the individual circumstances of the student

"NEAs are going to be completed to a range of stages in a range of subjects. Teachers should be given the opportunity to use this evidence, whether completed or not to help assess the student." (Teacher – responding in a personal capacity)

“We agree with the proposal that the student’s Art and Design non-exam assessment, ie, a portfolio – whether or not it is complete at the time of the assessment – should be the primary evidence teachers use to decide on the grade the student should be awarded.” (Other representative or interest group)

“NEA should not be used by teachers as students across the country have had varying levels of support with them as well as varying restrictions on evidence being gathered for the NEA.” (Student)

“GCSE PE as an example. Many children have not been able to record (film) one of both of their chosen sports as required by the syllabus. Teachers need to be given the freedom to mark pupils on what they have been able to submit given the significant COVID restrictions on sport, competitions, etc.” (Parent or carer)

“It should absolutely be encouraged that where possible NEA is taken into account when coming to grade judgements. However there may be contexts or circumstances where this may not be the best or fairest approach and so schools and colleges should have the flexibility within the arrangements (and any internal quality assurance requirements laid out by exam boards) to determine that.” (Other representative or interest group)

Many respondents commented that the NEA work should be considered alongside other evidence such as homework and mocks in order to determine the student’s final grade. Some other respondents felt that teachers should base the final grade entirely on the NEA work and that there was no need for any other evidence to contribute.

“I think teachers should mark them and they are then part of the data we use alongside mock exams, etc.” (Teacher – responding in a personal capacity)

“We believe that NEA should be considered as part of an holistic view of performance.” (Awarding body or exam board)

“As with other forms of assessment, schools and colleges should exercise professional judgement in how they use NEA in final grading, with common advice and guidance from exam boards.” (Other representative or interest group)

“I think coursework subjects should be entirely based on that work.” (Student)

Many respondents favoured teachers marking NEA and using it as evidence towards the final grade. However, there were two opposite views about whether exam boards should moderate teachers’ marking. Many respondents suggested that moderation will not be possible or appropriate due to the different levels of completion of NEA. Conversely, others suggested that moderation by the exam boards must take place as it would help to secure consistent marking, prevent grade inflation and promote public confidence.

“In geography, for example, some schools have managed to complete the NEA, others have not even started. Therefore, where it is feasible, they should be marked and used to help inform the awarding of grades but not moderated as this would be unfair on those who have not completed them or decided to concentrate on taught content over the NEA.” (SLT – Senior leadership team)

“Since not all students will have their NEA completed, marked and taken into account, these should not be moderated separately by exam boards but used as evidence in the same way as other student work.” (Other representative or interest group)

“Without moderation, this is a recipe for off-the-scale grade inflation.” (Academy chain)

“Moderation is essential if we are to achieve consistency and ensure that the grades awarded are robust.” (Other representative or interest group)

“Moderation needs to take place in order to ensure standards. Whilst the ability for all students to be taught to the same level has been affected by the pandemic, moderators could take this into account. Moderation would also add a balanced approach to in school assessment.” (Examiner)

Other comments from some respondents about moderation included that:

- moderation should take place with a centre declaration about how the pandemic has impacted completion
- NEA work should be internally moderated within centres

- there should be “light touch” moderation such as the provision of online standardisation for teachers

Some respondents mentioned particular challenges that have been faced by the teachers and students with respect to the NEA in specific subjects including that:

- access to specialist rooms and equipment had been a particular issue for design and technology, food nutrition and preparation, music, drama and dance
- it had been very difficult to assess students in their chosen PE activities as a result of closures and restrictions due to the pandemic
- speaking assessments in modern foreign languages were difficult to arrange
- it had been difficult to collect the data needed to be able to complete the fieldwork NEA in A level geography

“My A level Geography students have not been able to collect primary data in the current circumstances and have completed very little of the NEA. I believe that they have been put at a massive disadvantage.” (Teacher – responding in a personal capacity)

“GCSE PE cannot be fully completed in respect to videoing of club sport due to Covid-19 restrictions which is a significant disappointment.” (Parent or carer)

Some respondents made comments about the evidence that is needed to be able to award the Practical Endorsement result in the A level sciences, the spoken language grade as part of GCSE English language and the speaking endorsement in GCSE modern foreign languages (MFL). The collection of this evidence has been difficult with school closures, self-isolation and access to science laboratories and equipment. Most respondents who commented on the award of separately reported results and grades said that it would be sensible to suspend their award this summer. Some respondents commenting on the GCSE MFL speaking endorsement said a lot of effort had already been put into following the new criteria and that students should be awarded a grade for this part of the qualification.

“Some students have been unable to complete the GCSE English language spoken language component. This element should be disregarded this year, as it was last year.” (Teacher – responding in a personal capacity)

“Given poor access to practical science resources (due to kit having to be quarantined, reduced time in school, and reduced provision of technical support)

we reluctantly propose that for this cohort of students there should be no practical endorsement requirement for students to successfully complete their science courses.” (Other representative or interest group)

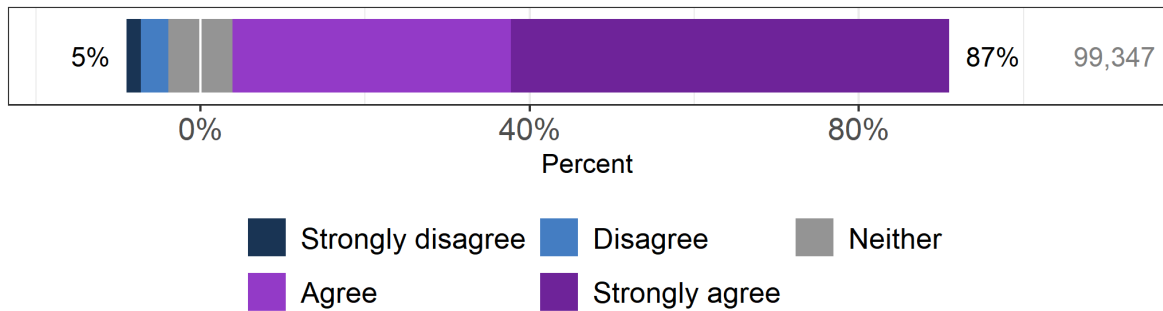
“For MFL, we had already received training and guidance on the speaking endorsement and have started to gather evidence. This should now be used and not scrapped and another system put in place.” (Teacher – responding in a personal capacity)

“Students have undertaken spoken English language assessments, but were told these would not form part of their final mark. I think they should now be used as part of the teacher assessments.” (Parent or carer)

“I strongly believe that the science practical endorsement should be ignored this year. It would be unfair to issue practical endorsements when very few students have been able to complete all of the required practicals.” (Student)

Q20. To what extent do you agree or disagree that a breadth of evidence should inform teachers' judgements?

Figure 21: Q20 - overall responses



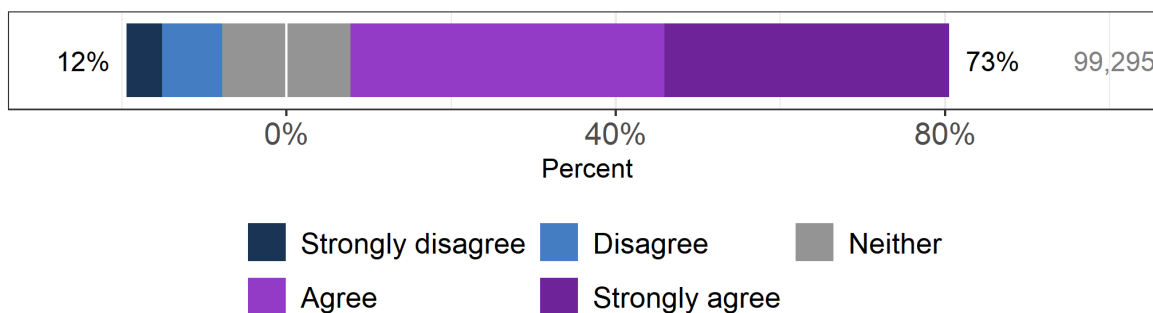
Q20 responses	Count	Percentage
Strongly agree	52,964	53%
Agree	33,588	34%
Neither agree nor disagree	7,735	8%
Disagree	3,333	3%
Strongly disagree	1,727	2%

Q20 total responses	99,347
No response	1,249
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q21. To what extent do you agree or disagree that the provision of training and guidance from exam boards should support teachers to reach their assessment of a student's deserved grade?

Figure 22: Q21 - overall responses



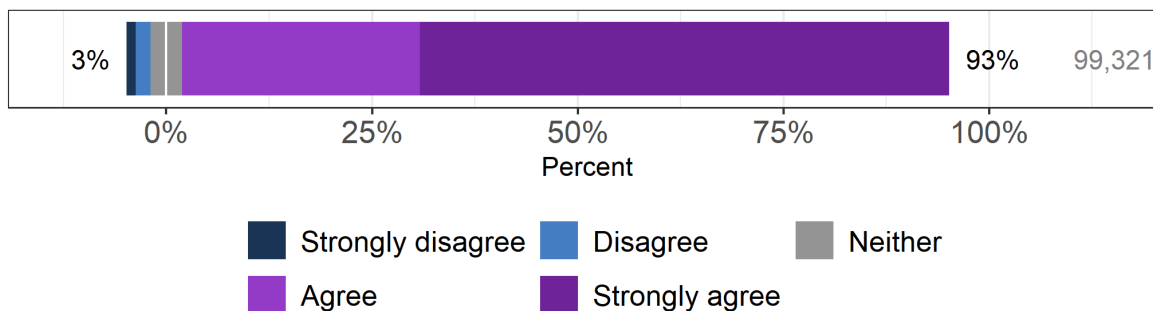
Q21 responses	Count	Percentage
Strongly agree	34,380	35%
Agree	37,860	38%
Neither agree nor disagree	15,486	16%
Disagree	7,295	7%
Strongly disagree	4,274	4%

Q21 total responses	99,295
<i>No response</i>	1,301
Survey total responses	100,596

Teachers were more in favour (79%) of being provided with training and guidance from the exam boards and Senior leadership team respondents similarly agreed and agreed strongly (80%). The exam board official responses agreed and strongly agreed to a lesser extent (50%).

Q22. To what extent do you agree or disagree that teachers should be able to take into account other performance evidence for a student before submitting a grade?

Figure 23: Q22 - overall responses



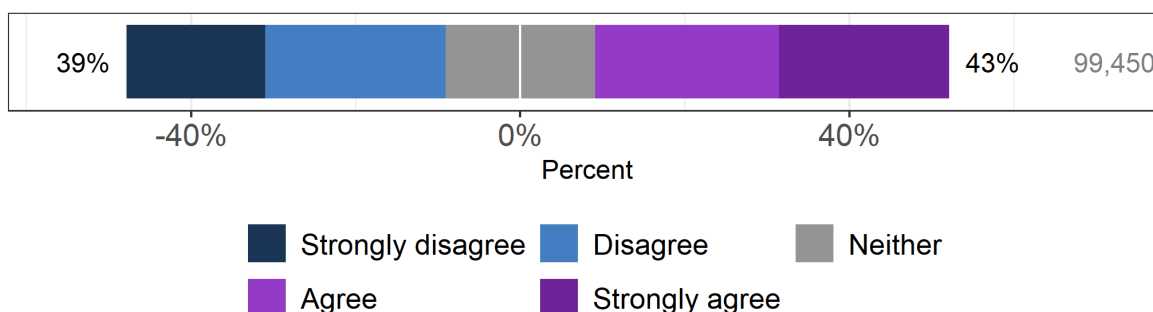
Q22 responses	Count	Percentage
Strongly agree	63,907	64%
Agree	28,711	29%
Neither agree nor disagree	3,805	4%
Disagree	1,798	2%
Strongly disagree	1,100	1%

Q23 total responses	99,321
No response	1,275
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q23. To what extent do you agree or disagree that performance evidence from closer to the time of the final assessment, should carry more weight in determining a student's final grade?

Figure 24: Q23 - overall responses



Q23 responses	Count	Percentage
Strongly agree	20,589	21%
Agree	22,243	22%
Neither agree nor disagree	18,080	18%
Disagree	21,783	22%
Strongly disagree	16,755	17%

Q23 total responses	99,450
No response	1,146
Survey total responses	100,596

Teachers were more in favour than other groups (49%) of performance evidence from closer to the time of the final assessment carrying more weight.

Q24. Do you have any comments on the use of other performance evidence?

We received 31,353 comments in response to this question.

Many respondents commented on the breadth of evidence that should be considered by teachers when determining a student's grade. The need for consistency in the evidence used from one school to another was frequently mentioned and respondents were keen to note that there needs to be clarity and guidance about the evidence that can be considered.

"It is vitally important that clear expectations and guidance is given to schools in order to act consistently in response to scenarios." (SLT – Senior leadership team)

"All proposals are fine if they are consistent." (Parent or carer)

There were also calls for flexibility to allow for different students' circumstances and arguments in favour of teachers determining the relevant evidence. Some parent/carers respondents said that teachers should be trusted to consider appropriate evidence to determine a student's grade. Concerns were raised about the evidence to be used for students who had been educated outside of a school or college. This includes students studying community languages at, for example, a Saturday school, who are entered for the qualification at their school or college.

"Teachers should have a wide range of types of evidence they can draw on when judging a student's final grade. This helps where there might otherwise be a shortage of evidence. A 'broad' picture of performance over time and from a variety of sources gives a stronger basis for making valid and reliable judgements than a smaller range of evidence from a single period of time." (Awarding body or exam board)

"Teachers should be trusted to know where their students sit in terms of grades." (Parent or carer)

"Teachers should be empowered to use their own knowledge of the ability of their students, including other performance evidence in order to form a fair evaluation and award a fair grade." (Other representative or interest group)

“Schools need to be given the autonomy to decide on the most appropriate evidence to use and the timing of that evidence, it is possible that this will be different for pupils within the same cohort due to their own personal experience of the pandemic. Schools should be allowed to use the optimum evidence for each individual pupil.” (Teacher – responding in a personal capacity)

“A suggested solution...is for mainstream schools to use a portfolio, including evidence from the candidate’s supplementary school or teacher, to arrive at a grade to submit to the exam board. This portfolio could include a bank of supporting evidence (according to clear criteria), including speaking assessment and signatures from the candidate, the supplementary school/teacher and the mainstream school submitting to the exam board.” (Other representative or interest group)

Respondents also commented that evidence is likely to be subject specific with different subjects requiring different types of evidence.

“Exam boards should provide some parameters of the types of evidence to be included, including coverage of subject content and assessment objectives. Otherwise teachers may find it difficult to consistently and fairly award grades.” (Awarding body or exam board)

“I think it needs to be subject specific, particularly when you consider the practical disadvantages that textiles, D&T, music, dance, drama and art students have had with the lack of appropriate access to specialist equipment and space.” (Teacher – responding in a personal capacity)

“For science-based subjects, homework containing exam style/past paper questions should be included in evidence.” (Student)

“Filmed practical work should be considered, eg, drama, dance, music etc.” (Teacher – responding in a personal capacity)

Many respondents commented on the specific types of evidence that could be considered. These included mock exam results, end of topic tests, homework, classwork and essays. Some reiterated their opposition to the use of assessments using exam board papers. Others argued in favour of a reliance on the use of exam boards papers as these would provide the best evidence of the standard at which the

student was performing. Some raised the importance of students knowing in advance when a piece of work or an assessment was going to be used to determine their final grade.

“We believe that if examinations are cancelled then it is not possible to replace them with tests set by the boards (or teachers) which are then used to determine student grades that teachers submit. We think that all reliable and robust evidence of student performance and capability, taken with the impact of Covid on their learning should be used by teachers to determine their grade.”
(Governor)

“It is very important that standardised assessments are used from exam boards.”
(Teacher – responding in a personal capacity)

“Work and exams, including mock exam results that were done before January, should not be used as performance evidence as students were not aware that there was a possibility they would be assessed on these for their results. Students are encouraged that mock exams, in particular, are a learning experience and not relevant for ultimate grades. It would therefore be grossly unfair to include these in assessments.” (Parent or carer)

“I think breadth of evidence should be used but that any additional exams should be kept to a minimum.” (Teacher – responding in a personal capacity)

“In general, it should be weighted to more recent work as that’s when the students have known their work may be assessed.” (Parent or carer)

Views on the relative weight that should be attached to evidence from earlier in the course and later in the course were mixed. Some argued that work done later in course would provide a more reliable indication of student performance, some commented that evidence should be taken towards the end of the course to account for student improvement. Others argued that greater weight should be given to work done before the start of the pandemic. Some argued that equal weight should be given to all evidence, whenever the work was produced. Views were also expressed on the relative weight that should be given to evidence according to the conditions under which the work was completed.

“Regarding whether performance evidence from closer to the time of the final assessment should carry more weight in determining a final grade, usually it would be argued that this should carry more weight as it reflects the significant improvements made over the course of a student’s A levels. However, with the serious amount of disruption caused and the detrimental impact on the mental health of students, it can be argued that a student is less likely to perform better in this time frame due to the strain on their mental health from the ever-changing situation.” (Student)

“In terms of 'performance evidence from closer to the time of the final assessment should carry more weight' - I strongly disagree with this statement. Some candidates will have been effected enormously by the pandemic and they will have produced some of their best work before March 2020. The teacher should look at the very best work available for each individual candidate produced during the two-year course.” (Examiner)

“Any evidence completed post March 2020 will be impacted by the pandemic. It is totally inappropriate to suggest that assessments sat in May 2021, some 14 months into such unprecedented times, would give students a fair chance of assessment.” (Parent or carer)

“The larger factors in determining what evidence to use or any weighting applied should be the conditions under which the work was completed and to what extent the work allows students to demonstrate what they know and can do.” (Other representative or interest group)

“Later in the year when more course content has been covered should carry more weight than earlier in the course.” (SLT – Senior leadership team)

“Teachers are professionals, who know their student's ability better than anyone. The weighting of evidence should be down to the teacher.” (Student)

“The larger factors in determining what evidence to use or any weighting applied should be the conditions under which the work was completed and to what extent

the work allows students to demonstrate what they know and can do.” (Other representative or interest group)

“Assessments not done in exam conditions cannot carry the same weight as those done in these conditions.” (Parent or carer)

“Mocks are better as you have more time to revise them properly, not cheat, and treat them like a proper exam so final grade decisions should be weighted towards these.” (Student)

Opinions also varied on the use of evidence from mock exams, given the different ways these are organised and marked and when (or if) they were done.

“The use of mock exams as evidence is flawed as schools use different criteria to set their mock exams, there is no comparability across schools in how they are set, marked and assessed. Some students will have sat mocks including topics they have not covered in class, staff may mark leniently as encouragement or mark harshly to encourage more work to be done for the real thing.” (SLT – Senior leadership team)

“I believe that mock exams and assessments should not carry any weight, mainly because many students will not have known that they will have counted toward their final grade, and there can be vast improvement, which may not be predicted, between the two periods.” (Student)

“My child has just sat mock GCSE exams at home online. I don’t believe this can be included as evidence - I believe many will have cheated.” (Parent or carer)

“Some sixth forms (including mine) haven’t been able to complete mocks as a result of lockdowns getting in the way.” (Student)

Concerns were expressed by some respondents about the objectivity of teachers’ judgements, including that:

- teachers may be biased in favour or against individual students
- teachers will be pressured by students or parents

- teachers will choose whatever evidence gives students the highest grade, resulting in grade inflation
- the more freedom teachers are given to choose the evidence, the less reliable the grades will be

“It is a very subjective way of assessment and is open to teacher bias either towards or against a pupil.” (Parent or carer)

“I don't believe that " teacher made" assessments will be fair across the whole cohort. As much as I am confident that ours would be robust and fair, I know that other centres would not be and that is evidenced by the inflated grades we are seeing in our current Y12 students that have come from other schools.” (Teacher – responding in a personal capacity)

“My daughter is worried as she knows some of her peers have admitted to cheating during assessments not conducted under exam conditions and have used notes, Google etc.” (Parent or carer)

“Grades awarded should be based upon unseen assessment papers given at the end of the year as they usually are to avoid potential inflating/cheating with giving grades. Teacher choice of the evidence for assessment is obviously biased and grossly unfair.” (Teacher – responding in a personal capacity)

Views on the need for teacher support and training were also mixed.

“We agree that teachers should be provided with training and guidance from exam boards on how to determine a students' grade as this will help towards ensuring consistency of approach and fairness for students.” (University or higher education institution)

“We are teachers. We mark, plan and assess. We do not need further time wasting training to do a job we can do already.” (Teacher – responding in a personal capacity)

Some respondents suggested students should be rewarded for other, non-academic, qualities shown by students throughout the pandemic.

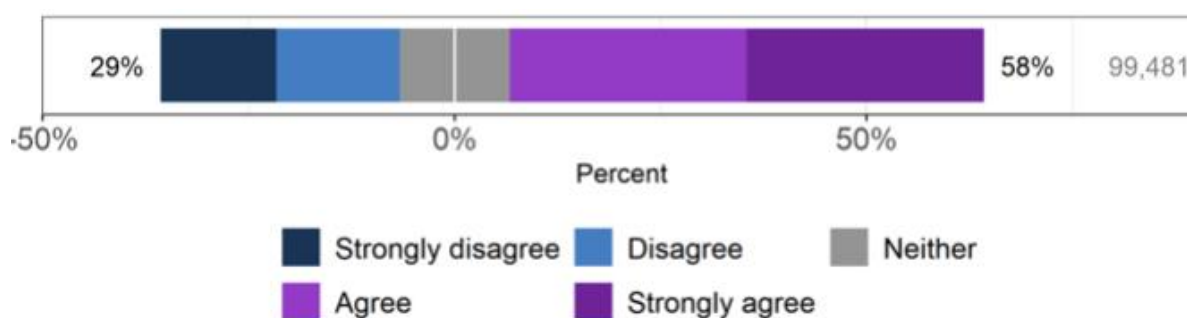
“I completely agree that a broad range of evidence should inform teacher’s judgements. This should include attendance, willingness to work or be productive and homework.” (Student)

“Students have been disadvantaged due to COVID and we don't know how those issues will affect students going forward into spring/summer. Therefore all work should be taken into account as well as attitudes and behaviours to learning.” (Teacher – responding in a personal capacity)

The assessment period

Q25. To what extent do you agree or disagree that all students should be assessed within a given time period for each subject – whether or not their school or college is using exam board papers?

Figure 25: Q25 - overall responses



Q25 responses	Count	Percentage
Strongly agree	28,731	29%
Agree	28,588	29%
Neither agree nor disagree	13,316	13%
Disagree	14,891	15%
Strongly disagree	13,955	14%

Q25 total responses	99,481
No response	1,115
Survey total responses	100,596

Fifty-eight per cent of respondents agreed or strongly agreed and 29% disagreed or strongly disagreed that that all students should be assessed within a given time period for each subject.

Most respondent groups on balance were in favour of this proposal. However, the rate of support from students was lower than other groups with 45% agreeing and strongly agreeing. Of those responding in an official capacity, 50% of respondents representing employers disagreed or strongly disagreed with the proposal. Of those representing awarding bodies or exam boards, 50% also disagreed or strongly

disagreed with the proposal. This was in contrast to the responses from the 4 exam boards where 2 were in favour, 1 was not in favour and 1 neither agreed nor disagreed.

Arguments in favour of a set assessment period included to provide clarity and certainty for students and teachers and to make the assessments fairer. There were mixed views on the length of any assessment period.

“Where exam board papers are being used, we agree that this should be within a limited time frame to stop information being leaked to ensure fairness and consistency.” (University or higher education institution)

Some respondents explained that they would like assessments to take place on a set date for everyone, replicating normal exams as students were until recently expecting this, had been working towards this and felt this was fairer. Many of the respondents who expressed this view also stated this would avoid leaking of papers.

“Any papers from exam boards should be used in all schools on the same date. Otherwise they will be discussed widely on the internet before some schools use them. Potentially very unfair to students who don't have 'advance knowledge' of the papers.” (Parent or carer)

“If we are all going to use the same tests in exactly the same way then these have to be within a specific examination period – ideally on same date...They should they be treated like exams if we are all going to use them...” (SLT - Senior leadership team)

“If external papers are set it is very important that they are taken at the same time as the leaking of the document and or the sharing of questions is inevitable...” (Student)

Some respondents would prefer an assessment window, with identified assessment weeks or periods. Although some argued for flexibility, respondents preferred a longer period to allow students to do a number of short tests.

“My preferred option would not be for single big assessment (an exam) but for a series of shorter tests that can better be accommodated within schools without disruption and to accommodate social distancing. Each test could have its own assessment window.” (Teacher - responding in a personal capacity)

“We agree that all students who have been prepared to take exams in the summer should take the common assessments within a set period of time. Given the challenges centres will face in delivering teacher assessment this flexibility is essential in allowing centres to choose a time that best meets their timetable and their students’ needs...” (Awarding body or exam board)

Respondents who were against an assessment period tended to favour teachers using evidence from across the entire course.

“...There should be no stipulated assessment window for centre assessment although centres will clearly want to ensure student assessments continue to the end of the course...” (Other representative or interest group)

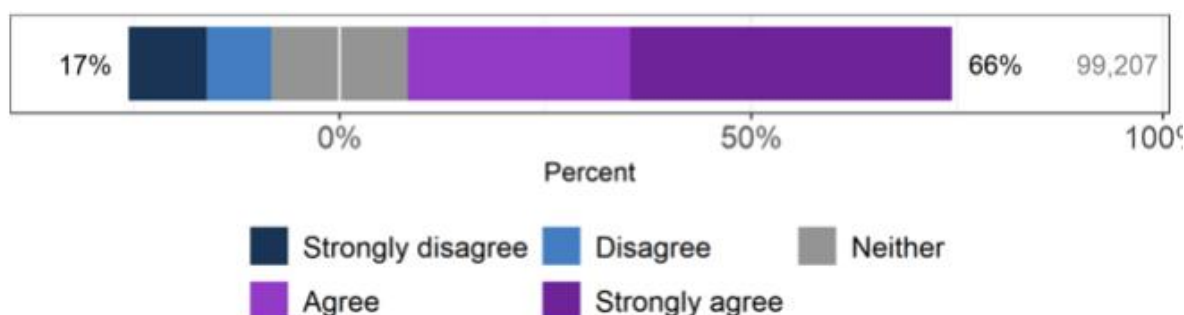
Some respondents identified that a set time period could be problematic due to the unpredictable nature of the pandemic going forward and that allowances need to be made for those who are ill or self-isolating.

“...Fixed assessment windows provide challenges if centres are closed or students are isolated and would therefore threaten the resilience of the system...” (Awarding body or exam board)

“...I am concerned that students may be disadvantaged if they are absent from a paper during this period due to illness, either for COVID related reasons or otherwise...” (School or college)

Q26. To what extent do you agree or disagree that exam boards should publish all of their papers shortly before the assessments in order to manage the risk of some students being advantaged through papers being leaked?

Figure 26: Q26 - overall responses



Q26 responses	Count	Percentage
Strongly agree	38,753	39%
Agree	26,815	27%
Neither agree nor disagree	16,476	17%
Disagree	7,784	8%
Strongly disagree	9,379	9%

Q26 total responses	99,207
No response	1,389
Survey total responses	100,596

Sixty-six per cent of respondents agreed or strongly agreed with this proposal and 17% disagreed or strongly disagreed. All respondent groups were in favour. Parents, teachers, examiners and those representing local authorities, private training providers and universities and higher education organisations had the highest rate of agreement and strong agreement of 70% or over.

Some respondents stated that exam boards should publish their papers so that teachers and students could be better prepared for the assessments. This was often linked with lost learning and there having been less time to cover their courses of study.

“Release the papers early to allow students to prepare.” (Student)

“Publishing exam board papers shortly before the assessments would also provide teachers with an opportunity to view all papers and make a selection on what paper best represents the content and skills covered...” (Awarding body or exam board)

Some suggested the topics rather than questions should be published to protect the validity of the assessment and reduce the rote learning of answers. Others suggested that papers should only be released to centres and teachers, not students.

“...Topic banks should be published so that teachers can plan the revision schedule and which topics to cover. Question banks can be restricted to Exams Officers, SMT and HoDs....” (SLT – Senior leadership team)

Some favoured the early availability of papers.

“The exam papers should be available as early as possible so that teachers can plan, prepare and create a safety net as future events cannot be predicted.” (Other representative or interest group)

Others did not want papers to be published at all, because they would be shared, including over social media.

“If teachers are given the questions in advance there is a danger that some kids will be taught the questions in advance. It is fairer if teachers are not given the exams in advance...” (Parent or carer)

“Publishing the papers beforehand gives more advantage to the students who are taking the papers later on in the time period which is unfair.” (Student)

“It doesn't matter when they are released, the questions will be on social media very quickly...” (Teacher - responding in a personal capacity)

Some respondents assumed the papers would all be taken at the same time, so they would not be leaked.

“I don't understand the proposal to release early to avoid a leak. Why would this be different to any other year if they are to do assessments at the same time.” (Parent or carer)

Q27. Do you have any comments about the assessment period for the use of exam board papers or teacher-devised assessments?

There were 26,794 responses to this question, many of the themes have been discussed in questions 25 and 26.

Many respondents stated that there should not be any exam board papers, as discussed under question 14. Some were concerned about the continuing impact of the pandemic.

“Stop trying to replace exams with exams. By suggesting that we can only assess within a certain time frame you are not taking into consideration the current situation. The fact that students may be self-isolating, the fact that they may not have returned to school for any amount of time.” (SLT – Senior leadership team)

Some respondents referred to the time period replicating that of a VTQ-style assessment.

“On-demand' papers are used regularly for vocational qualifications without any issue, so why not for GCSE?” (Awarding organisation employee)

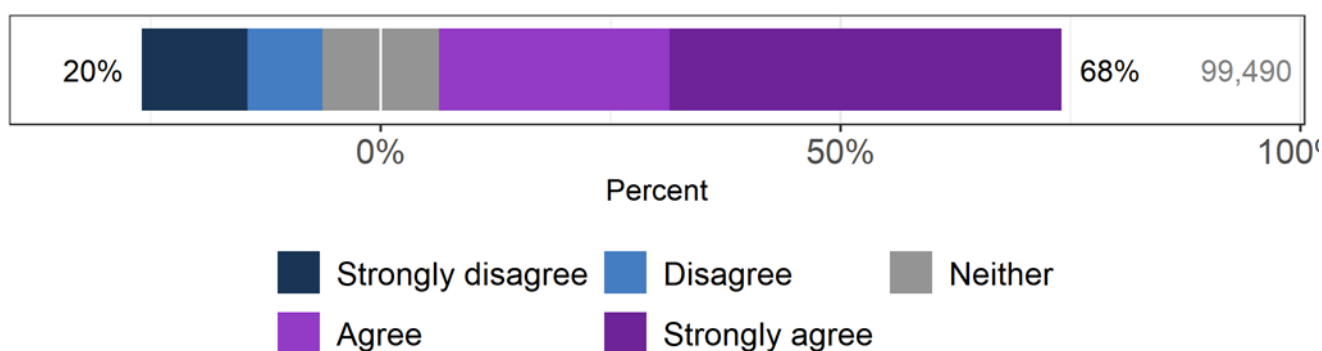
Some respondents stated that if exam board papers are not used then a specific time period would not be required, and the timing of assessment could be more flexible.

“I think if a school is not using exam board papers it should not matter when they are carried out and should be carried out when best suits their pace of learning/where they are in the course...” (Student)

The conditions under which students should be assessed

Q28. To what extent do you agree or disagree that the assessments should, if possible, be taken within the student's school or college?

Figure 27: Q28 - overall responses



Q28 responses	Count	Percentage
Strongly agree	42,440	43%
Agree	24,941	25%
Neither agree nor disagree	12,596	13%
Disagree	8,060	8%
Strongly disagree	11,453	12%

Q28 total responses	99,490
No response	1,106
Survey total responses	100,596

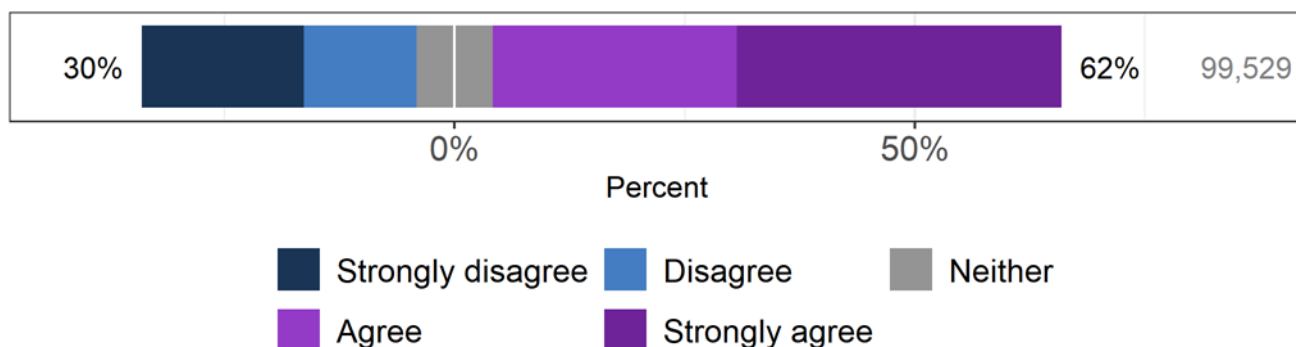
The majority of respondents to this question (68%) either strongly agreed or agreed that assessments should, if possible, be taken within the student's school or college; 20% either disagreed or strongly disagreed.

There was stronger support for the proposals from senior leadership team respondents (87%), exams officers and managers (86%), and teachers responding

in a personal capacity (85%), while 57% students, including private, home-educated students of any age, agreed or strongly agreed.

Q29. To what extent do you agree or disagree that if the pandemic makes it necessary a student should be able to take their assessments at an alternative venue, including at home?

Figure 28: Q29 - overall responses



Q29 responses	Count	Percentage
Strongly agree	35,174	35%
Agree	26,385	27%
Neither agree nor disagree	8,249	8%
Disagree	12,226	12%
Strongly disagree	17,495	18%

Q29 total responses	99,529
No response	1,067
Survey total responses	100,596

The majority of respondents to this question (62%) either agreed or strongly agreed that, if the pandemic makes it necessary, a student should be able to take their assessment at an alternative venue, including at home; 30% either disagreed or strongly disagreed. There was a higher degree of support from private, home-educated students of any age (73%).

There were no respondent groups in which more people opposed rather than supported the proposal. However, responses from exams officers and managers were more closely balanced, with 47% in favour compared to 44% who were not.

Q30. Do you have any comments on the conditions under which students should be assessed?

We received 35,366 comments in response to this question.

Respondents commented on the need for fairness and consistency in the assessment conditions, with many suggesting that this would be best achieved in schools and colleges where the assessments for all students could be properly supervised. Respondents raised concerns about the validity and reliability of results from assessments that were not supervised.

“They should be the same for all students (except the usual access arrangement changes, readers and scribes, etc). They should be supervised otherwise there is no credibility.” (SLT – Senior leadership team)

“The best case scenario to my mind is that conditions allow for all assessments to take place at school/college. If a pupil cannot take the assessment then grades can still be awarded by staff without an assessment taking place. The assessment should be an opportunity for pupils to show that they are worthy of X grade. All efforts should be behind a fair assessment season and credible assessments.” (School or college)

“There are simply too many risks in allowing the assessment to be conducted anywhere else than the school environment. The disadvantaged would suffer BADLY relative to those who had supportive and exam capable "help" at home. Every effort MUST be made to ensure that the assessment is fair for all students.” (Governor)

“External assessment only has validity if control measures are in place. Otherwise Alexa will be responsible for a significant proportion of results this year.” (SLT – Senior leadership team)

Many respondents said that it would not be possible to know whether assessments taken at home were fair.

“In the last year, I have watched my daughter's school run tests at home and have had to organise several at my place of work (a university). Instances of cheating are disappointingly common (or, what is perhaps worse, the worry that it has occurred but cannot be proved - or the student cannot free themselves from it

if unfairly suspected). The thought of trying to police this on a national scale seems quite impossible.” (Parent or carer)

“Students sitting papers at home would open the exams to potential cheating. Schools wouldn't be able to send staff to invigilate and if a student's parents aren't able to stay home with them then there would be no supervision.” (Exams officer or manager)

“Having recently invigilated 6th form tests over Zoom in student homes, it is a highly stressful event for all. Students felt sick that they would be accused of cheating if they moved their head between paper and screen ... I was invigilating 19 students and it was impossible to tell who was doing what and was a complicated start and end of the exam ... and it is inevitable that some students around the country will feel the need to cheat and devise ingenious ways of getting help during the exam.” (Teacher – responding in a personal capacity)

There were many comments about the impact that different home environments would have on students taking their assessments, for example, disadvantaging students without access to a laptop or reliable internet or a quiet place to work.

“A concern with the conditions under which students should be assessed is that all pupils need access to the correct resources and if taking exams at home, they may be disadvantaged from the outset if they do not have access to the necessary equipment - for example, an appropriate, quiet place to take the exam or physical equipment such as a sharp pencil, pens, calculator, spare supplementary paper.” (Local authority)

“It is starkly clear that a number of our Y11 students would be extremely disadvantaged if they had to sit formal assessment in their own home. The reality for many families is that they do not have a quiet and appropriate space for the assessments that will define final GCSE grades.” (School or college)

“It's been really hard to study at home during lockdown, there has been too many distractions. I would find it very difficult to concentrate if I had to complete the work at home. Also I'd be worried if other children would cheat and I'd be disadvantaged.” (Student)

Respondents also raised concerns about how students with special educational needs or disabilities would be supported to access the assessments at home. This was a particular concern for students who would usually be supported by a reader or scribe, or through assistive technology.

“How would special needs pupils have access to amanuensis at home? Currently family members are not allowed to act as scribes. They are entitled to the support and when you have a cohort that is solely special needs, the ability to be able to show their understanding is severely impacted without a scribe/reader.” (Exams officer or manager)

“One very important point I'd like to make here, what will be the provisions for those given reasonable adjustments in exams. I have dyslexia and have heard about what this means considering the new arrangements. This needs to change, I need more information about what that will mean for me in terms of being assessed.” (Student)

“Assessment should be in a recognised venue NOT at home. When the candidate is a Braille user, the QTVI (Qualified Teacher of the Visually Impaired) is usually the moderator in the school situation. In this pandemic, the QTVIs are NOT allowed into the home situation. The Braille user and MLP user must have access to specialist equipment to participate in assessments. This is not available at home.” (Other representative or interest group)

Some respondents were concerned about the challenges for teachers and schools in trying to verify assessment evidence produced at home. In particular, some said that uncertainty about the authenticity of the work would undermine the usefulness and objectivity of any exam board set papers. Similarly, those who commented on the difficulties associated with inadequate home resources were concerned about how to deal with assessments that were not, in their professional opinion, reflective of a student's academic capability.

“If a student performs exceptionally well in a home test, does the teacher then have to make a judgement as to whether they consider that the student is genuinely capable of that result? Will teachers have to sign a form authenticating work carried out remotely? What teacher wants to accuse a student of cheating without the evidence to support this?” (SLT - Senior leadership team)

“An assessment undertaken at home cannot be taken as a fair example of a student's ability. For a truly level playing field, assessments should only be undertaken in controlled conditions at school, as was the case with GCSE controlled assessments some years ago. Students have differing circumstances at home which would put some students at an advantage, for example if they had access to a parent who would help them, or at a disadvantage, if their home environment is not suitable for working.” (Teacher – responding in a personal capacity)

Many respondents suggested that it would be better for exam board set papers to be optional rather than taken in an uncontrolled or unsuitable environment. Others suggested that students who were not able to attend school for their assessments should be able to take an alternative paper or assessment in school at a later date.

“I am strongly in favour of assessments being taken in college and not at home. There will, understandably, be COVID-related reasons why students can't undertake their assessment(s) in the centre. I am in favour of exploring ways in which the assessment could be undertaken at a different venue or at a later date. However, I need to see more precise detail to be confident this can work without disadvantaging candidates.” (School or college)

“If a student cannot take an assessment at school because of self-isolation or similar, they should have the opportunity to take another test at a later date in school within the assessment window. This is essential to ensure fairness which cannot be guaranteed at a different venue. In extreme circumstances when a student is unable to take either test, teacher assessment solely should be accommodated.” (Parent or carer)

Some respondents suggested that much depended on the status and use of the exam board set papers. Those who viewed the papers in the same light as high-stakes examinations commented that the risks associated with home assessments were too great and that it would not be possible to have confidence in the outcomes. However, other respondents said that if the papers were considered as part of a package of evidence to inform grading decisions, then the assessment conditions could be more flexible. In this situation, they said that teachers would be able to use their professional judgement and knowledge of the student to determine whether the work produced in home-based assessments reflected their usual standard of work, and in the case of any disparity, weight the evidence accordingly.

“It really does depend on how you view these tests. If they are one part of an overall assessment picture and do not necessarily heavily dictate the grade awarded, then fine, they can be completed at home. Please make them part of

the picture and do not set them up as mini versions of the full GCSE or A Level examination.” (Other representative or interest group)

“This is why I think making them compulsory and high stakes doesn't work! If I did an exam in school and I knew my mate was doing it at home with access to the internet, textbook, parents, private tutor on the phone etc, and I also knew that our scores on this exam were really important for our grades, I would not be happy. On the other hand, if I knew that this was one test among many and I knew that my teacher had a good grasp of my real ability (and my mate's real ability) I would think that was ok.” (Teacher – responding in a personal capacity)

“Doing papers at home carries an obvious risk but I assume the idea is that these papers are only ever used to corroborate the teacher assessed grade. If there is a big discrepancy between what (on the basis of performance in the classroom) a teacher thinks a pupil will get and what they appear to get in an exam sat at home, teachers will have the professionalism to interpret the results of the exam paper with appropriate scepticism.” (School or college)

Many respondents argued against assessments being taken in schools or colleges – or indeed anywhere.

“I think it is wholly unfair to expect students who have not been provided with access to full and sufficient schooling since March 2020 to sit an exam! This would add stress and potential further distress, when the teachers already have all of the information and evidence needed to provide their students with a grade.” (Parent or carer)

“I believe that it wouldn't be fair for students to take part in any sort of assessment because we've missed out on so many months of school, some children have difficulties learning online as well, meaning they are also missing out on key online lessons that wouldn't be fair for everyone.” (Student)

Others were concerned about the safety and manageability of the school and college environment in the pandemic, particularly if the assessments were taken in traditional exam halls. Some suggested giving priority to exam students, while others supported students being able to take their assessments at home.

“Don't make it under exam conditions! We have lost most of our invigilators and support staff are being run ragged trying to manage the covid lateral flow testing

as well...we just do not have the resource to run formal assessments in anywhere except classrooms this year.” (Exams officer or manager)

“I believe they should definitely prioritise conducting exams in school as some people struggle to do work from home and these exams should be as COVID safe as possible, ie, shutting the rest of the school so students have the opportunity to spread out across the whole school and do their exams and reduce risk of transmission.” (Student)

“Although education is clearly important, health and wellbeing comes first. There are also many disabled and unwell children who are unable to attend school and due to the pandemic are at even greater risk. They definitely need the option to be assessed at home.” (Parent or carer)

“Students cannot be expected to go into school. Exams may be important but they are not worth anyone's life. Students live with grandparents, elderly relatives and vulnerable family. They should not have to carry the weight of knowing they could be carrying a highly infectious and deadly disease home, just to take an assessment.” (Student)

Many respondents commented on the uncertainty of the situation with the pandemic and argued the need for flexibility, with schools and colleges being able to exercise discretion.

“Whilst it is clear in the interest of fairness and integrity, that exams and assessments are sat in conditions that are "secure" - we all know that that will not be possible and therefore the government and Ofqual need to arrange for both types of settings to happen and be seen to have legitimacy.” (School or college)

“We need to have a plan for remote assessment, as we can't be certain schools can open safely. School facilities need to be made available to all students without adequate IT access at home.” (Parent or carer)

Some highlighted the particular needs of clinically vulnerable and shielding students, private candidates, and international students or UK students who are usually resident at their schools. Some suggested that these students should definitely be able to take assessments at home. Others suggested that these should be considered on an individual basis with home assessments being permitted by

exception or as a reasonable adjustment for disabled students, or as a form of special consideration.

“Absolute necessity that students within shielding families - who thus are a danger to their family members if they attend school - should have the option to sit in home assessments. This especially applies to Home-Educated students. The Home-educated exams group is lobbying to take exams in summer, but many Home-educated students are not able to attend due to being part of a shielding family. These students must be allowed to be assessed at home.”
(Parent or carer)

“Many students and private students are unable to secure a place at test centres and those that are able to secure a place are having to pay higher than normal fees due to issues around spacing students appropriately to minimise the risk of Covid. Therefore, there should be the option for students and private candidates to complete the assessments at home.” (Student – private, home-educated of any age)

“This is extremely difficult for international schools whose students are studying remotely abroad. The borders are currently closed, making it harder and more expensive to travel to the UK, and then they would have to follow quarantine/self-isolation rules. This is a situation in which the pandemic is not as threatening as it is right now however there is no evidence that things will get better. It is better to suggest ways of assessing as if we will be in the current situation as well.”
(Exams officer or manager)

Some respondents suggested that assessments taken at home should be considered only as a last resort, in order to minimise cheating and to make the arrangements manageable.

“My son quickly picked up on the fact that the children who were self-isolating got tests sent home, were therefore not supervised and consequently cheated and got better marks. He then started refusing to attend school on days when assessment were scheduled.” (Parent or carer)

“This will depend on the level of invigilation required. It will not be possible for a school such as mine, with 50+ students, to allow all to sit an exam at home, at the same time, if normal exam-level invigilation is required, as we do not have the capacity to manage this. Also, the logistics of making the exam available to

students' home, and returning the same to exam boards will present an immense problem. Home exams will not be a viable option unless they are online.” (Exams officer or manager)

“Ofqual will be aware how challenging and expensive universities have found it to implement secure systems for guaranteeing that modular exams and finals exams taken outside the direct supervision in person of staff, are the student’s own work. It is not reasonable to expect schools and colleges to implement similar levels of control and remote supervision in the time frame available to them between now and May/June.” (School or college)

A few respondents raised questions about the format of the assessments, commenting that students might find it difficult to take assessments on screen rather than paper. Some also suggested that some subjects would be less accessible on screen.

“Should assessment be completed online at home, then pupils need prior guidance in how to use the online assessment tools and their difficulty of use needs to be improved; eg, the difficulty when using accents for languages or accessing a map in geography whilst trying to read the questions at the same time. This was a disaster in a previous online assessment.” (Parent or carer)

“The proposals are not clear on whether assessments taken outside the centre would be taken on screen or on paper (or whether that would be optional). It should be noted that some skills that are assessed in sciences are harder to replicate on screen, and it is doubtful that something could be put in place on this timescale to accommodate this.” (Other representative or interest group)

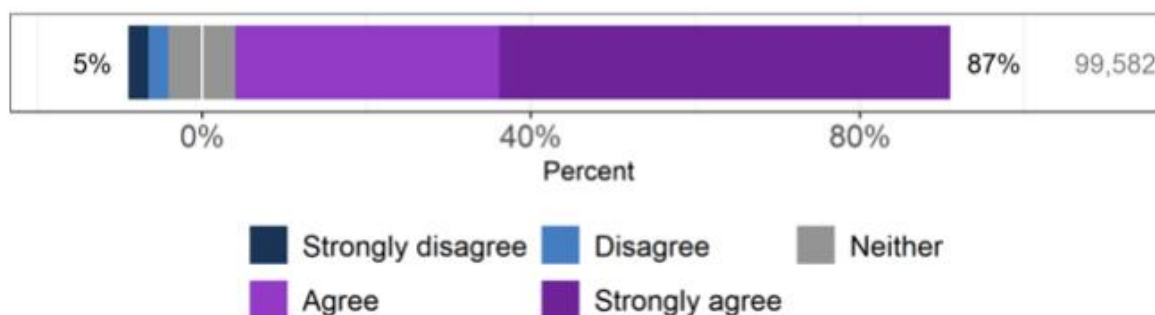
“It is extremely difficult to work with multiple representations - graphs, algebra, other diagrams, etc, without pen and paper” (Teacher – responding in a personal capacity)

Many of the responses to this question conflated views on the assessment conditions with views on the assessment method. Consideration of how, rather than where, students should be assessed and the evidence that should inform their grades is addressed in response to questions 14, 19, and 24.

Supporting teachers

Q31. To what extent do you agree or disagree that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements?

Figure 29: Q31 - overall responses



Q31 responses	Count	Percentage
Strongly agree	54,630	55%
Agree	31,963	32%
Neither agree nor disagree	8,124	8%
Disagree	2,440	2%
Strongly disagree	2,425	2%

Q31 total responses	99,582
No response	1,014
Survey total responses	100,596

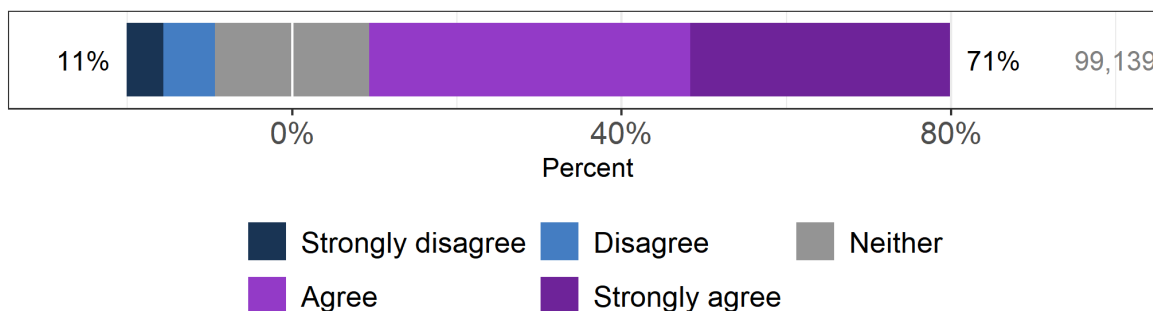
There was consensus that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements with 87% of all respondents either agreeing or strongly agreeing with the proposal.

The pattern across all of the respondent groups was broadly similar.

Internal quality assurance

Q32. To what extent do you agree or disagree that the exam boards should set requirements for school and college internal quality assurance arrangements and should provide guidance on these requirements to support centres?

Figure 30: Q32 - overall responses



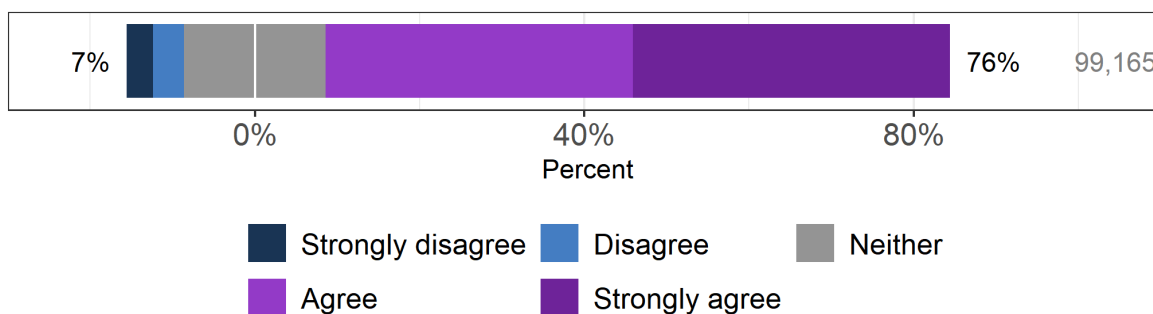
Q32 responses	Count	Percentage
Strongly agree	31,269	32%
Agree	38,691	39%
Neither agree nor disagree	18,517	19%
Disagree	6,239	6%
Strongly disagree	4,423	4%

Q32 total responses	99,139
No response	1,457
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q33. To what extent do you agree or disagree that the head of a school or college should make a declaration to the exam board confirming its requirements had been followed and teachers had regard to the guidance and support materials provided?

Figure 31: Q33 - overall responses



Q33 responses	Count	Percentage
Strongly agree	38,238	39%
Agree	36,981	37%
Neither agree nor disagree	17,016	17%
Disagree	3,784	4%
Strongly disagree	3,146	3%

Q33 total responses	99,165
No response	1,431
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q34. Do you have any comments about internal quality assurance?

We received 15,708 responses to this question.

Many of those who commented agreed that internal quality assurance was necessary to ensure that grades were reliable and comparable within a centre, and trusted by employers, further and higher education institutions.

“Teachers will need the support of exam boards in how to meet the assessment requirements to ensure that they arrive at grades which are valid, fair and reliable.” (School or college)

“This has to be an essential aspect of the approach adopted for 2021 in order to provide a level of assurance regarding consistency and support to teachers in the application of methods such as standardisation, moderation and awareness of potential bias.” (Other representative or interest group)

“Ensuring consistency is essential. A similar set of procedures as currently operates regarding internal quality assurance would be useful. If procedures are brought in teachers would need time/training to ensure they were appraised of requirements.” (Teacher - responding in a personal capacity)

Many respondents highlighted the need for clear and comprehensive guidance that was the same for all exam boards.

“I worry about confusion and discrepancies between different exam boards. It's Ofqual's role to oversee the exam boards so transparency is key across the board.” (Awarding organisation employee)

“Clear and pragmatic requirements will be essential to ensure that standards are set and maintained nationally. As mentioned, it is likely that exam boards can build on previous NEA advice and guidance to do this.” (University or higher education institution)

Many respondents noted the internal quality assurance already in place, particularly in subjects using non-exam assessment which could be built on for 2021. However, others felt that, as schools and colleges already had robust systems in place, they should be trusted to award grades without the oversight of the exam board.

“We already have systems in place for non-exam assessment which involves schools undertaking internal moderation and standardisation before signing

declarations. The same systems should apply.” (Teacher – responding in a personal capacity)

“Internal quality assurance processes should be clearly outlined for scrutiny by boards and for information in case of appeal. It is unreasonable to expect teachers to carry out a level of internal quality assurance that is far removed from their normal quality assurance mechanisms and exam boards themselves should be adequately resourced to take on this quality assurance wherever necessary.” (University or higher education institution)

“I trust the teachers, as professionals, to make the correct judgement for each child. They have seen evidence of their ability and do not need to be told how to assess a student. As long as the school moderates the results themselves and teachers are consistent amongst each other, then that should be enough.” (Parent or carer)

Many respondents also commented on the manageability of the proposed approach, raising concerns about teachers’ workload, the feasibility of introducing the proposals in the time available and the continuing uncertainty of the pandemic. Some respondents were concerned about the need for quality assurance requirements to work in small centres, in which there might only be one subject specialist teacher.

“Given the extraordinary pressures on centres and their staff and the short time scale, it is essential that any arrangements are manageable and do not increase workload pressures or create burdensome administration demands.” (Other representative or interest group)

“You must ensure staff are given time for this training. I agree it’s important but it must come with timetable remission in order to give it due attention. Otherwise the planning of other year groups will suffer or teachers already under intense pressure will end up having to give up more of their own time. Respect the wellbeing and workload of teachers.” (Teacher – responding in a personal capacity)

“In general, we agree with the need for an internal standardisation process that is auditable by exam boards. However, if centres are allowed to set their own tasks, the risk of inconsistency due to the assessment itself, how it is assessed and how grade boundaries are decided could quickly lead to an unfeasible workload. To

this end, we again would strongly advocate that only a menu of exam board-set questions are used and centres are not allowed to set their own assessments. This would help considerably with any quality assurance arrangements and moderation/auditing of any assessments.” (School or college)

“Whilst it would be helpful for the exam boards to set requirements for internal quality assurance measures, these must take into account courses where the teacher is the sole specialist within the provider and how they can be equally standardised.” (School or college)

Many stressed the need for flexibility in centres’ internal quality assurance processes, including in the evidence used to inform teachers’ assessments.

“Such guidance will need to recognise the potentially wide variety of evidence schools will have relating to individual students, particularly in light of lost teaching and learning time. It must furthermore recognise that in order to show performance from across as full a range of qualification requirements (both content and skills) a breadth of evidence will be required.” (Awarding body or exam board)

“Quality assurance processes are very important, but we disagree that there should be exam board-set requirements as they may be too inflexible to cater for the diverse range of providers and the range of experiences of the pandemic. Instead there should be guidance rather than requirements to ensure that it is applicable to all circumstances.” (School or college)

“This is putting the exam boards in charge and again this is wholly inappropriate for this academic year due to the varying quantity and quality of teaching available since March 2020. The only proper way to assess the students this year is by the assessment of the teachers and not an external generic body.” (Parent or carer)

Many respondents disagreed with the proposals relating to internal quality assurance because they felt that external exams should remain. A few respondents who disagreed felt that additional requirements regarding internal quality assurance would hinder, rather than help to achieve, consistency.

“It would be very easy for exam boards to publish a quality assurance framework with regulations that in theory generate consistent results within a school. These will inevitably be different from any school’s normal processes and will create

stress and bureaucracy. Interpreting what the exam boards are asking for will be open to discussion and argument. Anyone who has ever attended a school department internal moderation exercise will know that these meetings are fraught affairs at the best of times. The extra consistency that we would gain from imposing an exam board internal quality assurance would be minimal and not worthwhile.” (SLT - Senior leadership team)

There were few comments relating to our proposal that the head of a school or college should make a declaration to the exam board confirming its requirements had been followed and teachers had regard to the guidance and support materials provided. Some suggested that it may be appropriate to allow other staff to sign the declaration, in case of illness. Some also commented that it might be more appropriate for a Head of Department to sign a declaration for each subject as they would have closer oversight of the process within a centre. Where respondents disagreed with the proposals, they cited either the pressure on headteachers or concerns about malpractice. A few respondents, including some school senior leaders and representative groups, were concerned about potential legal repercussions of these declarations, particularly with regard to appeals. They also highlighted concerns about a headteacher being able to sign a declaration if some of the evidence used to support grading decisions had been completed without the usual controls (assessment conditions are discussed further in the analysis of questions 28 and 29). A few respondents were concerned that these declarations would be signed regardless of whether agreed processes had been followed, and some mentioned the need for clear processes for staff or parents to raise concerns where they felt that the requirements had not been met.

“The headteacher declaration is needed, but a deputy may be needed to be allowed should the headteacher be unavailable, eg, through illness or self-isolation.” (School or college)

“Heads of Department should also sign a similar form as we do when we submit non-examined assessment.” (Teacher – responding in a personal capacity)

“School leaders are already under enough pressure and to make them responsible, and, therefore, accountable, for this moderation and QA process, potentially puts them in an invidious position in relation to outcome appeals. It will also be time consuming and burdensome.” (Other representative or interest group)

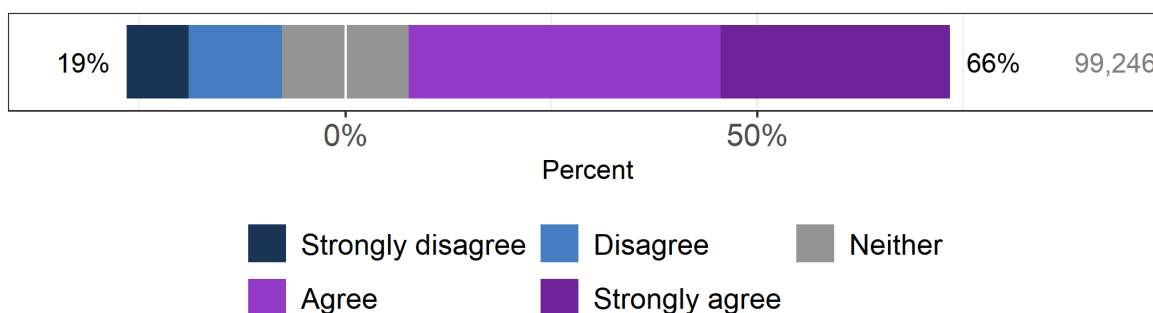
“There should be protection for teachers or other school/college staff acting as whistle-blowers in relation to malpractice or misrepresentation by Heads of schools or colleges regarding compliance with the guidance. Chairs of Boards of Governors should also be required to countersign the declaration.” (Parent or carer)

“If exams are sat in homes, no one can be accountable for rules being met.” (Teacher – responding in a personal capacity)

External quality assurance

Q35. To what extent do you agree or disagree that the exam boards should quality assure how schools and colleges are determining grades?

Figure 32: Q35 - overall responses



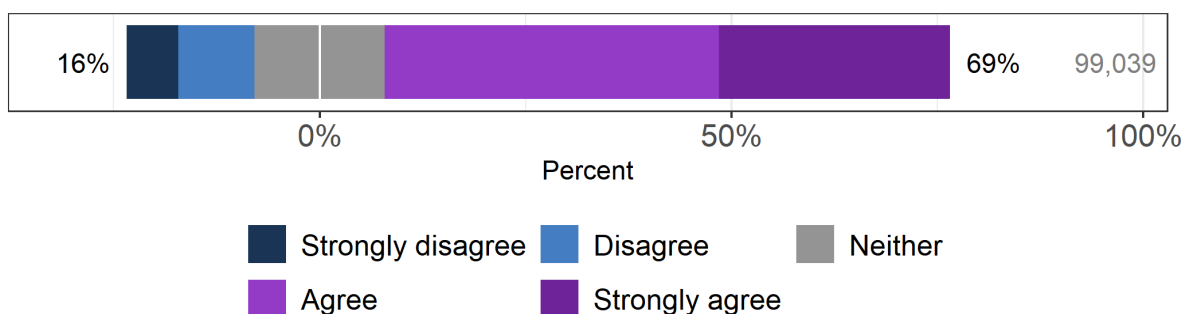
Q35 responses	Count	Percentage
Strongly agree	27,648	28%
Agree	37,619	38%
Neither agree nor disagree	15,233	15%
Disagree	11,284	11%
Strongly disagree	7,462	8%

Q35 total responses	99,246
No response	1,350
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q36. To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

Figure 33: Q36 - overall responses



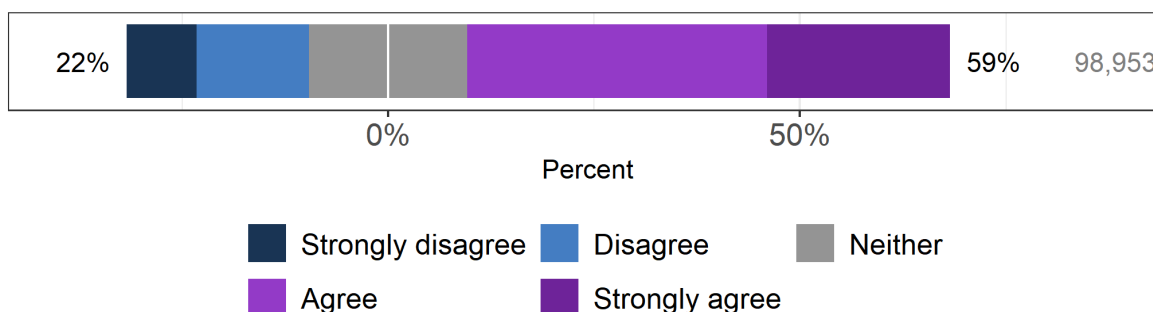
Q36 responses	Count	Percentage
Strongly agree	27,837	28%
Agree	40,156	41%
Neither agree nor disagree	15,683	16%
Disagree	9,176	9%
Strongly disagree	6,187	6%

Q36 total responses	99,039
No response	1,557
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q37. To what extent do you agree or disagree that the exam boards should sample, at subject level, the evidence on which the submitted grades were based?

Figure 34: Q37 - overall responses



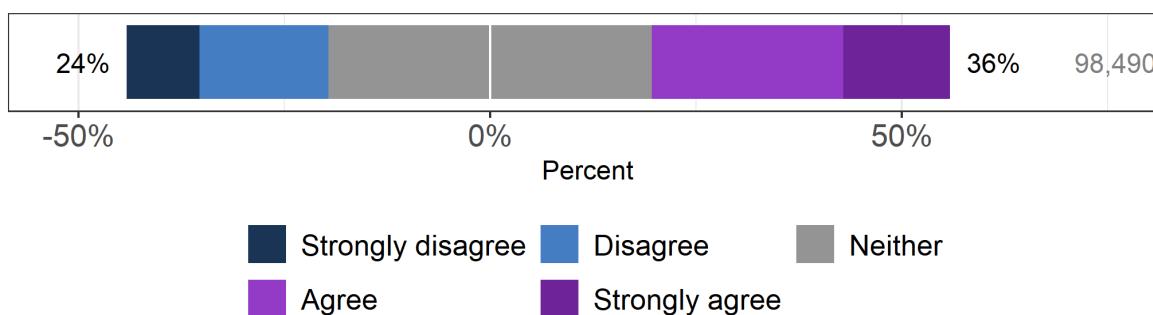
Q37 responses	Count	Percentage
Strongly agree	22,012	22%
Agree	36,015	36%
Neither agree nor disagree	18,994	19%
Disagree	13,509	14%
Strongly disagree	8,423	9%

Q37 total responses	98,953
No response	1,643
Survey total responses	100,596

Teachers were more likely than other groups to disagree and strongly disagree with this proposal (29%), as were school and college senior leadership teams (27%) and awarding organisation employees (28%).

Q38. To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

Figure 35: Q38 - overall responses



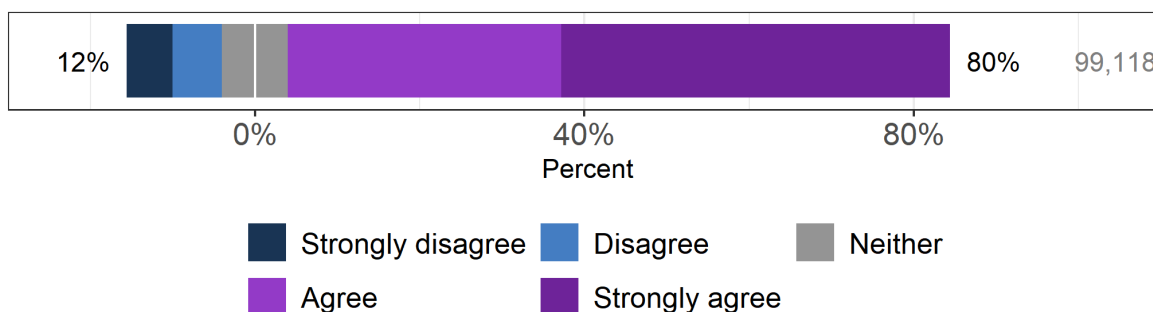
Q38 responses	Count	Percentage
Strongly agree	12,753	13%
Agree	22,913	23%
Neither agree nor disagree	38,713	39%
Disagree	15,372	16%
Strongly disagree	8,739	9%

Q38 total responses	98,490
No response	2,106
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q39. To what extent do you agree or disagree that exam boards could only change a student's grade after a review of the evidence and discussion with the school or college?

Figure 36: Q39 - overall responses



Q39 responses	Count	Percentage
Strongly agree	46,804	47%
Agree	32,905	33%
Neither agree nor disagree	7,924	8%
Disagree	5,957	6%
Strongly disagree	5,528	6%

Q39 total responses	99,118
<i>No response</i>	1,478
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q40. Do you have any comments about external quality assurance?

We received 18,441 comments in response to this question.

There was broad agreement across all respondent groups with all of our proposals regarding external quality assurance. Many respondents, but most particularly parents and students, neither agreed nor disagreed with our proposals that exam boards should target their external quality assurance activities. All respondent groups agreed/strongly agreed that exam boards should only change a student's grade following a review of evidence and consultation with the centre.

Many of those who agreed with our proposals mentioned the role of external quality assurance in ensuring public confidence, consistency across centres, and fairness. Some respondents, including teachers and senior leaders also commented that robust external quality assurance was important in confirming teacher judgements, and protecting teachers from undue pressure to inflate grades, or from significant volumes of appeals.

“Strong and robust quality assurance externally is vital for public confidence and student confidence in results and to avoid a long and protracted session of appeals. It will also affirm the work of teaching staff and centres in their own internal quality assurance.” (Other representative or interest group)

“Achieving grade equivalence and comparability between candidates and centres is essential to build confidence in the system and external quality assurance is key to achieving equity and fairness. Centres, teachers and students will need absolute clarity about how exam boards will approach this and what type of evidence will be sampled, how they will identify the need for review and how any grade adjustment would be made.” (School or college)

“I know of some schools where Headteachers came under tremendous pressure from parents to boost grades last year, so a more rigorous evidence-based approach is welcomed this year.” (SLT - Senior leadership team)

“We strongly agree that exam boards should put in place quality assurance procedures to ensure schools and colleges determine students grades as consistently as possible, in the absence of examinations. The aim of the quality assurance process should be to ensure that schools and colleges have followed the guidance and support provided by exam boards in gathering appropriate evidence and awarding teacher assessed grades to their students. The emphasis

of the quality assurance should be confirming that the guidance regarding appropriate forms of evidence (including the common assessment) and internal standardisation have taken place.” (Awarding body or exam board)

Some respondents suggested external quality assurance arrangements should be supportive, and where possible minimise teacher workload. Some also raised concerns about the feasibility of rolling out these processes in the time available.

“Agree that this is desirable but given the timing of any agreed approach, there appears little chance of implementing a robust system. If a process of verification is adopted, it should cover ALL centres to the same extent and to the same quality. Given the timing of the consultation, a system of random or risk-based sampling may be more achievable.” (Other representative or interest group)

“While necessary, this needs to be proportionate (not placing too onerous a burden upon teachers and schools) and a very fast turnaround if results and appeals are to be processed by mid-July.” (School or college)

“We believe that this is important for the integrity of the process and for students' results to be respected. Our young people deserve results that command respect. However, exam boards should be conscious that this moderation will be taking place after teachers are likely to have had to mark all their own papers - a task that is normally conducted by exam boards - and during a period when teachers are likely to be marking end of year exams. Therefore, any process should be appropriately light-touch, and focused towards where there is evidence of a concern.” (School or college)

Some respondents commented on the potential use of data as part of the external quality assurance process. A few respondents were concerned that external quality assurance processes may change results in their centre depending on their prior performance, or limit the number of high grades that a centre could award. These respondents thought that this was unfair and that any use of such data should be made clear before the external quality assurance process took place. Other respondents stated that the rank ordering of students (as happened in 2020) may be useful again, particularly in situations where exam boards felt grades should be adjusted.

“There should not be a quota or limit to the amount of high grades that a school can give as this would mean that if a student deserved a high grade, they would not be able to receive it based on the bad grade history of the school. Many teachers I know are under the impression that they may only give a certain

amount of grades 7s, 8s and 9s and that they would not be able to give any more of those grades even if a student deserved that grade. This would lead to high levels of unfair, low grades in deprived areas of the country leading to prejudice and discrimination. It should be made clear to every teacher that there is no limit to the amount of a certain grade they can give. Exams boards should not have any interference in a pupil's grade unless it is absolutely necessary and that grade is purely false.” (School or college)

“External quality assurance cannot be like the algorithm used last year and cannot disproportionately affect high achieving state school students. For the largest part, teachers should be trusted for assessing grades.” (Student)

“Without any system of ranking candidates, it is difficult to see how whole cohort adjustments could be made.” (Other representative or interest group)

In relation to question 37, some respondents were concerned that subject level sampling of work, while desirable, would not be possible in the time available, or would create an unmanageable workload for both teachers and exam boards. Many also commented that subject sampling should only take place where there was a clear anomaly in results for a particular subject, or concerns about the quality of internal quality assurance. Others asked that any subject sampling should be done in a consistent way across subjects.

“Schools should internally moderate to quality assess grades at a subject level, and exams boards should quality assess this process rather than at an individual subject level.” (Teacher - responding in a personal capacity)

“We are worried about the burden on teaching staff of external sampling of student work. The teachers are being asked already to change plans again, to cope with a new method of assessment and then to have unnecessary visits in each subject would increase workload and stress further.” (School or college)

“It would put too much demand on exam boards to moderate at subject level for every school. I believe moderation of a sample overall from each school is fair and then look more deeply if concerns raised.” (Parent or carer)

“External quality assurance should only be undertaken in cases where schools/subjects appear to be vastly different from expected/historic performance. Otherwise, it will place a huge burden on schools and teachers to produce vast evidence portfolios for something that is new and uncertain.”
(Teacher – responding in a personal capacity)

Most respondents who commented in relation to question 38 suggested how centres should be targeted, with many suggesting the targeting of centres whose submitted grades were significantly different to their prior performance. Some also suggested targeting centres where grades had been changed in the past (eg, where teacher-assessed NEA marks had been significantly adjusted previously) or where there had been significant staff turnover. Some respondents were concerned that certain centre types, particularly schools in more deprived areas, could be disproportionately targeted, so disadvantaging their students. A few respondents thought that every school should be treated the same way.

“Identify schools which are presenting atypical data out of line with past and existing performance data.” (Teacher - responding in a personal capacity)

“Look at the past evidence, if a centre has always been consistent, let them continue. It is centres who are new, or have been inconsistent, or have a high staff turnover which may need verifying.” (Teacher - responding in a personal capacity)

“This may unnecessarily target smaller schools and as a result students may be penalised. Every centre should be equally checked.” (Student)

Most comments in relation to question 39 supported the idea that exam boards should consult with schools where they felt a grade should be changed, but thought this should only happen rarely and that where grades were changed the reason for doing so must be made very clear to the centre. Many respondents argued that exam boards should not change centre grades without compelling evidence to do so. There were concerns that the plan may be impractical if there were many queries or appeals, and that consultation with centres should not run into the school holidays. Some respondents also questioned what would happen if exam boards and centres could not agree on potential grade changes.

“In the current climate, it would be inappropriate and deeply unfair for any board to change a grade, unless there was concrete and irrefutable evidence that it was necessary to do so.” (Teacher – responding in a personal capacity)

“Failure to do this could disadvantage students and may unfairly impact on the most disadvantaged.” (University or higher education institution)

“The idea that boards review and discuss every grade change appeal with schools is unrealistic. The potential tsunami of appeals will make this impractical. Boards must mark the papers that they set, so they can more easily quality control the grading and consider appeals with some robust evidence of their own.” (School or college)

“We are concerned that considerable time and resource will be needed for the reviews of evidence and the dialogue with centres and reaching agreement may sometimes be difficult and require some dispute resolution.” (Other representative or interest group)

“If exam boards are going to consult with schools this consultation should not occur in the school holidays as the time of teachers needs to be protected.” (Other representative or interest group)

Many respondents who disagreed with our proposals felt that any externally set assessment should be marked externally by the exam boards, and as such no quality assurance would be required. Other respondents felt that if internal quality assurance procedures were robust, then no exam board intervention was necessary, or that teachers alone should decide on grades.

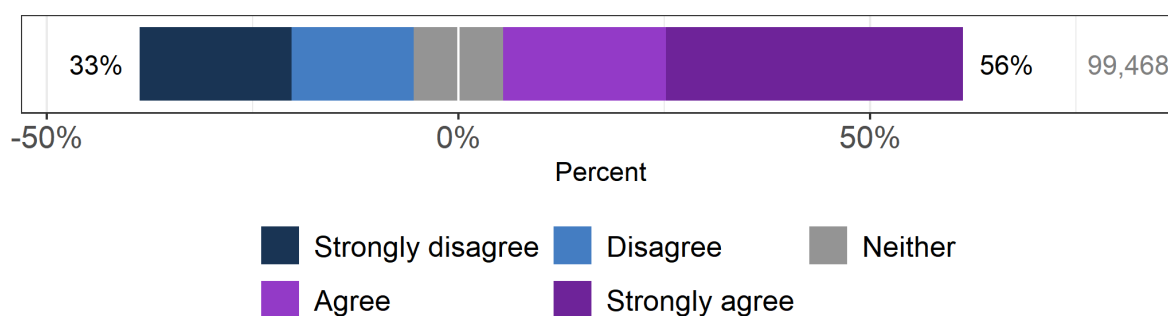
“If external assessments are being set by exam boards they should be marked and quality assured by exam boards. However, we do not agree that externally set exams would be fair in this exceptional year. Guidance issued by exam boards needs to be clear with detailed expectations of what they are asking teachers and schools to do.” (Other representative or interest group)

Many private, home-educated students who responded to this question could not see how they would fit into these processes. Some were also concerned that the potential additional workload of accepting private candidates would put centres off accepting them (see also the analysis of questions 53-57 relating to private candidates).

How students could appeal their grade

Q 41. To what extent do you agree or disagree that students should not be told the grade their teacher has submitted before results day?

Figure 37: Q41 - overall responses



Q41 responses	Count	Percentage
Strongly agree	35,922	36%
Agree	19,648	20%
Neither agree nor disagree	10,784	11%
Disagree	14,756	15%
Strongly disagree	18,358	18%

Q41 total responses	99,468
No response	1,128
Survey total responses	100,596

The overall figures, with 56% of respondents indicating that students should not be told and 33% saying that they should, hid a range of opinions which differed between respondent groups.

There was significant difference between students and teachers, with nearly 50% of students having answered 'disagree' or 'strongly disagree', compared to only 9% of teachers, senior leaders and exams officers.

These differences of opinion were captured in some respondents' comments.

"As a parent I feel strongly that students should only know their grades once they have been awarded. My GCSE student son feels strongly that he should be

allowed to know his submitted result before it is awarded in order to relieve anxiety.” (Parent or carer)

Among responses from organisations, two respondent groups (awarding bodies and exam boards, and employers) expressed more disagreement with the proposal than agreement. All four of the exam boards recognised to offer GCSEs, AS and A levels disagreed with the proposal.

Respondents made a variety of comments in response to this question. Many said that students should be informed of the grade that their teacher *intends* to submit, often linking this to students having a chance to act upon the information in order to improve their grade.

“I think it is only fair that pupils and teachers discuss grades so pupils have a fair chance to improve if they so wish. If we are no longer testing a pupil’s ability on a given day, we’re assessing them on effort/desire as well as ability so you should make the process as transparent as possible.” (Teacher – responding in a personal capacity)

“Students should be told their proposed grade prior to results day, so they have the opportunity to do extra work/assessments, etc, to build up suitable evidence of the grade they deserve.” (Student)

Similarly, some respondents noted that as a normal part of teaching and learning, teachers would be expected to keep students informed about the level at which they are working. Some expressed fears that too strict a reading of our proposal would prohibit this important feedback for students, while others observed that if students are aware of the grade at which their teacher thinks they are working then prohibiting teachers from telling them what grade has been submitted does not serve a substantive purpose.

“Under normal circumstances (for example I did this when I did GCSEs), I would usually have many conversations with my teachers leading up to exams about the grade I am aiming for and how I can improve to achieve this. However, seeing as teachers won’t be allowed to tell us the grade they are giving us (and our school has told us not to ask about grades) it feels like we cannot have these type of conversations as it feels like we are prying.” (Student)

“I see no reason why students should not be advised of the likely grade teachers will submit or even the grade they are submitting. This will simply give extra time to students to plan accommodation and plans for progression. Where teachers are not allowed to tell students, this runs the risk of students not being able to

understand their current working at level during the process, which they would normally have the opportunity to know.” (SLT – Senior leadership team)

“On number 41 - surely students will have a rough idea of how they're getting on because they'll get feedback on their papers (and by the way this MUST be allowed). So what's the point?” (Student)

“In the most effective schools, teachers should continually inform students of their progress towards grades so final outcomes should not be a surprise to anyone. Pupils should not get any surprises on results day. If work and any mock exams have been marked correctly and students informed of their marks and understand all the quality assurance procedures then they should be satisfied.” (Teacher - responding in a personal capacity)

Overall, we received many more comments saying that students should be informed early. The majority of these were from students. The two most frequent reasons given were to ease the stress on students and to allow for an appeals process (formally or informally) to commence earlier. Both of these were often framed in terms of giving students certainty about the future.

“Children should be informed of the grade their teacher intends to award prior to submission as this would allow for any mitigating circumstances of which they weren't already aware to be discussed.” (Parent or carer)

“Students should definitely find out before the grades are submitted - there is already a significant state of uncertainty and it wreaking havoc on students' mental health, particularly increasing anxiety. For Year 13 students applying to university, they should know their grades before so there is some certainty over which university they are likely to go to, to give some sort of peace of mind in these unsettling times.” (Local authority)

“Results should be shared after submission so the student can feel less stressed or at least start to prepare for the appeal process if needed.” (Student)

A number of respondents said that informing students of their grades in advance of receiving official results would reduce the number of appeals. Others, however, made precisely the opposite point.

“In determining how and when students might be informed of their final grade, we would propose a process that involves ongoing discussion between a teacher and a student about the potential grade to be awarded. This provides transparency and prevents any sudden surprises. In our view, this in turn has the potential to significantly reduce the risk of appeals and gives the student some agency in the process.” (Awarding body or exam board)

“Really important that students are not told their grades prior to results. It gave students unprecedented cause to appeal last year.” (Consultant)

Respondents who agreed that students should not be informed made different points. Most frequently, they raised concerns around the pressure which might be brought to bear on teachers.

“Teachers will be put in an intolerable position and come under enormous pressure from candidates and their parents/guardians if they are able to disclose teacher-assessed grades in advance of the publication of results. Here the arrangements must mirror 2020, when discussion of centre assessment grades was not permitted prior to the issuing of results.” (SLT – Senior leadership team)

“Teachers should not tell students their grade before as it can lead to unnecessary tensions and arguments before the appeal process.” (Student)

“I worry that telling students grades before formally giving them will open dialogue with students and lead to students/parents complaining to schools and colleges. By issuing grades and then making an appeal process formal, I think it will lead to less complaints/appeals.” (Teacher – responding in a personal capacity)

Others raised points around the effect that knowing their likely result would have on students’ motivation and mental health.

“Strongly agree that students should not be told the grade their teacher has submitted before results day and there are many reasons for this. Teachers are experts at building confidence and aspirations – this has the potential for students to feel demoralised and will compare with other students which a typical exam process eliminates and depersonalises the process.” (Exams officer or manager)

“Applicants want certainty as soon as results are known about their future and whether they have been placed at their firm choice institution. Notifying students

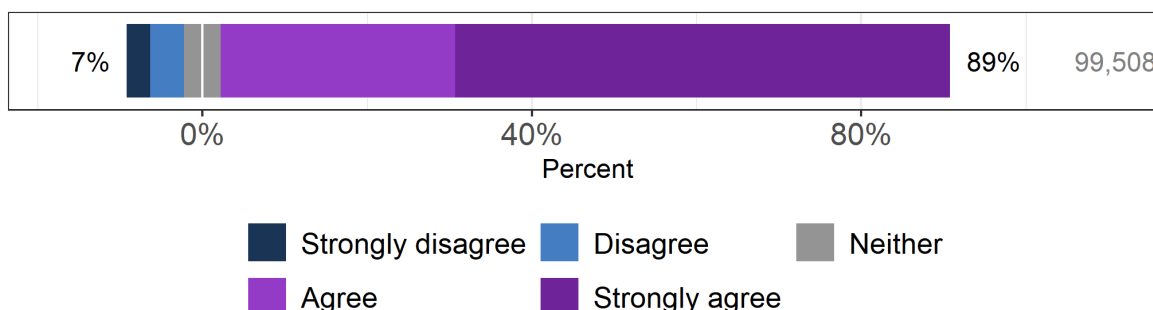
of their results before we are told of their results would increase uncertainty, impact mental health of students and be stressful for students and their parents as well as school teaching staff.” (University or higher education institution)

Many responses also conflated this question with questions 49 and 50, which respectively ask about earlier results days and the decoupling of results being released to students and higher education institutions. We discuss comments about the timelines for results, appeals and further and higher education admissions in those sections. The overwhelming sentiment in relation to this question was that informing students of their grade might allow for an earlier appeals process and for grades to be finalised before they are sent to higher education institutions.

“Students should know their grades beforehand (for example May/June) in order to have sufficient time to appeal. Once grades are confirmed, students and universities should be told and decisions should be made from then.” (Student)

Q42. To what extent do you agree or disagree that students should be able to appeal their grade on the grounds that their teacher made an error when assessing the student's performance?

Figure 38: Q42 - overall responses



Q42 responses	Count	Percentage
Strongly agree	59,820	60%
Agree	28,306	28%
Neither agree nor disagree	4,435	4%
Disagree	4,117	4%
Strongly disagree	2,830	3%

Q42 total responses	99,508
No response	1,088
Survey total responses	100,596

While every group of respondents supported the proposal, the overall figures again disguise a range of strength of feeling. Students, for example, were 97% in favour and parents and carers were 94% in favour. Similarly to question 41, teachers and senior leaders were the groups most opposed, but both were still more in favour than not, with 60% and 58% support respectively.

The range of reasons which respondents gave for supporting the proposal was relatively limited, focusing on just a few key areas. Many comments simply acknowledged that teachers can make mistakes, and that it was therefore necessary to allow appeals on this basis.

“It would be unfair to deny students the right to appeal on the grounds that the mark has not been assessed correctly. Teachers may occasionally make

mistakes in judgement (as examiners do) or may be influenced by knowing the student.” (Teacher – responding in a personal capacity)

“Teachers may make mistakes, and should this happen, students should be given the opportunity to appeal the grade they were given.” (Student)

Similarly, some respondents voiced concern about judgements being subject to conscious or unconscious bias.

“Students should be able to appeal as some teachers may have bias but the appeals should only be granted when there is obvious mistakes with the grade.” (Student)

Many others acknowledged that appeals on this basis should be allowed but were clear that appellants should be required to present evidence to support their appeal.

“Appeals should require the student to demonstrate an error has been made before being considered so as not to burden schools with appeals that have no basis.” (Teacher – responding in a personal capacity)

“It is important that students are able to present evidence that suggests their grade should have been different from that awarded by the teachers to allow a review of results. However, without evidence, pupils should not be able to challenge the grade they have been awarded.” (School or college)

The other common reason given for supporting appeals on the grounds that teachers made an error when assessing the student’s performance was that teachers might fail to properly take into account various mitigating circumstances, including bereavement, illness, learning loss, caring responsibilities and adverse home circumstances.

“Appeals need to be very wide in scope for this academic year and must take into account the personal situation of students. Many have been affected by parents and close family members and friends either being very sick or dying as a result of Covid-19. The impact on the mental wellbeing of students and the disruption to the 2020 and 2021 academic years cannot be overstated and must be a factor in any assessments. This will never be perfect but these are exceptional and unprecedented times which call for tolerance, understanding and empathy.” (Parent or carer)

“Students should be able to make appeals on the grounds the teacher has not taken into consideration disruption to their learning, whether that is being a young carer or the impact of COVID on mental health.” (Student)

“Students may also wish to appeal on the basis of extenuating factors – eg, the amount of time out of school due to illness/isolation etc . How will these be taken into account?” (Parent or carer)

Despite the relatively few numbers of respondents who opposed our proposal, there were a number of reasons given for doing so. Most prominent was the concern about the potential for very high volumes of appeals and excessive pressure on teachers, schools and colleges if appeals were permitted on the grounds of teacher error when assessing students’ performance, with students thinking they have nothing to lose and ‘just giving it a go’. The requirement for evidence to support any appeal was often raised as a potential mitigation.

“This will be a huge can of worms if you allow appeals on the basis of teacher judgement. My school is still dealing with the aftermath of last year and it could get very personal for teachers. If the exam board has moderated at subject level, this should not be necessary. If it is going to be allowed, there will need to be a lot of time for it.” (Teacher – responding in a personal capacity)

“There needs to be a burden of proof on the student, to demonstrate something tangible to support an appeal, otherwise schools will drown in “well, I’ll give it a go” types of appeals. There need to be strict criteria that need to be met before a student can appeal. These shouldn’t be perused on a whim by the student and their family. Appeals are incredibly time consuming. If the whole cohort appeals all grades, then the process simply will not be able to be done before sixth form or university admissions windows close. My school is still dealing with appeals from last year!” (Teacher – responding in a personal capacity)

“There needs to be very clear criteria and grounds for any appeal. I am very concerned that a high proportion of students who may want a higher grade and consider an appeal on the basis of “Well I might as well give it a go!”. This would create a massive task for schools. Perhaps there is an expectation that the student provides evidence as to why there should be an appeal - such as significant work showing evidence of higher performance during the course.” (SLT – Senior leadership team)

Many respondents said that appeals should only be allowed on the basis of administration or process errors by the school or college, often referring to the form of appeals in 2020.

“This was all set up last year and worked really well. Please don’t change it. Pupils could appeal if they felt there had been an admin error or an error in process. Allowing appeals on the basis of judgement is absolutely fraught with danger - please do not do that.” (School or college)

“Teachers are professionals and headteachers have to sign saying the process was followed. The only appeals should be, as last year, errors of factual reporting (input errors) or appeals that procedure was not followed. Appeals against individual assessing teachers should not be possible or indeed an institution where no discrepancies can be evidenced.” (Student)

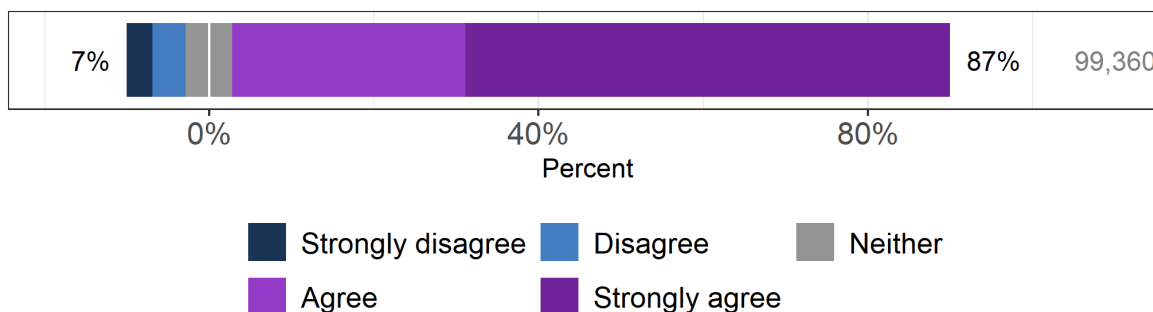
Others expressed concern that appeals on this basis could result in certain types of student – for example those with well informed and resourced parents – being advantaged.

“There is a risk of pushy parents refusing to accept the school’s judgements resulting in a ‘those who shout & push the loudest get what they want’. How will schools be protected from this?” (Teacher – responding in a personal capacity)

“We all know that the sharp-elbowed middle classes will be all over these appeals. Other students, with less strident parents, will be left to languish.” (Teacher – responding in a personal capacity)

Q43. To what extent do you agree or disagree that the school or college should consider the appeal?

Figure 39: Q43 - overall responses



Q43 responses	Count	Percentage
Strongly agree	58,446	59%
Agree	28,155	28%
Neither agree nor disagree	5,622	6%
Disagree	3,999	4%
Strongly disagree	3,138	3%

Q43 total responses	99,360
<i>No response</i>	1,236
Survey total responses	100,596

Viewing response rates by respondent group reveals some variation in the extent to which this proposal was supported, but no group showed less than 61% support for the proposal.

Despite the large degree of support for the proposal, the comments which were made about whether schools and colleges should consider the appeals were much more evenly balanced.

Those who commented to say that appeals should be considered by schools frequently did not give grounds for their opinion. However, comments which did revealed two main reasons. Most prominently, many comments observed that the school and teacher know students best and are therefore best placed to consider an appeal.

“Appeals should be made to the teacher who calculated the assessed grades. They should deal with the appeal and discuss with the pupil. There is no point in getting someone external involved, even if they are another teacher at the school, because what do they know about this student's performance in the last two years?” (Student)

“Teachers should be allowed to make decisions about students’ grades; they are the ones that know the students the best. Appeals should not be used/seen by students as a way for them to get a higher grade. Teachers will use their professional knowledge and understanding to apply grades correctly and accurately. Therefore, if an appeals process is used, it should be done internally to save time.” (Teacher – responding in a personal capacity)

“I am not sure that exam boards will be very well placed to consider students appeals as I would expect schools to show the student the evidence on which their grade was based as part of their original appeal so perhaps appealing to the exam board is only relevant if a school doesn't do so.” (Exams officer or manager)

“As previously stated, my subject teachers know me best. My circumstances at home are known by my teachers, and for the impacts I experienced in year 12 for to be overlooked, from a mental health perspective, would be outrageous.” (Student)

Others focused on the principle of accountability and ‘ownership’ of the grade given to students.

“I am in 2 minds here! Either schools and college totally own the process of allocating, moderating and appealing grades. (exam boards being brought in as a last resort). OR Exam boards "Own" and manage the whole process, with schools faithfully following the guidance.” (Teacher – responding in a personal capacity)

“If teachers are being asked to assess students they should be accountable to the students for the grades that they give. This can be done early at a local, school level. Students will receive their grades from the school leaving enough time for contacting universities to confirm places/starting an appeal at the school

level or appeal from the exam board where the student doesn't feel that the school followed procedures.” (Parent or carer)

Some respondents emphasised the need to trust the professionalism of teachers.

“Given the variety of assessment this year parents, students, exam board and universities will need to place trust in the professionalism of the teachers assessing and each school will need to decide internally what the best process should be for any appeal. Transparency from the start about the process will help all parties involved.” (Teacher – responding in a personal capacity)

A much wider range of reasons were given as to why schools and colleges should not consider appeals. The most prevalent reason was concerns about the impact of holding a school- and college-based appeals process on teacher workload, including a frequent concern about an appeals process requiring teachers and other staff to work through the summer holiday period.

“My concern is the amount of time this would take schools to complete. Schools’ depleting budgets would be stretched even further with this additional work and pressure.” (Governor)

“I think the idea that students can appeal their grades to the college is totally unworkable. We have about 2000 students taking exams, so an approximate total of 6000 grades. Many hundreds of these students would appeal their grade because they would have nothing to lose and we simply could not cope with that volume at the end of term when teachers would be going on holiday, after a very hard year. We would not be able to process the appeals, let alone have each one investigated, before the university decisions. I think appeals should only be allowed where the school or college had not followed the agreed procedure, as it was in 2020.” (Exams officer or manager)

“This will be an absolute nightmare for schools and is a terrible idea! Schools are likely to face a tidal wave of appeals which will cause huge amounts of extra work and stress for all involved. Schools may be tempted to submit higher grades to stave off such a tidal wave.” (Teacher – responding in a personal capacity)

“This is further burden put onto schools when they have no capacity. The number of appeals could be vast, and the huge time burden of investigating these appeals will have a huge impact on the capacity of the school to function. This will either coincide with the summer term when the school needs to be focusing on

how to bridge the huge gaps for the students still in school, or during the summer holidays when staff will be getting their well earned break..." (SLT – Senior leadership team)

Many respondents questioned the legitimacy of schools and colleges being asked to review appeals about their own judgements, arguing that they would be unlikely to rule against themselves, particularly in the context of having been through internal quality assurance procedures. On this issue, many of the comments also related to the concept of a 'competent person' as described in questions 44 and 45.

"If you ask a "competent person within the student's school or college" to review a student's assessment, this will probably be a friend and colleague of the person who originally marked the work. There is then a potential conflict of interest, (particularly if there is a power imbalance in the relationship between the reviewer and original marker - for example if the reviewer's performance management and therefore pay progression are decided by the person whose work is being reviewed) such that the review may be strongly biased towards agreeing with the original mark." (Examiner)

"Internal appeals are likely to be unfair. Appeals should only be made to exam boards who are impartial, rather than school/college staff who have a conflict of interest." (Student)

"Appeals need to be handled externally if at all possible. Many schools are closed communities, so asking another teacher within the school to adjudicate presents a conflict of interest." (Parent or carer)

"It cannot be fair to allow schools or colleges to run their own appeals processes. Many subjects may be single-staff departments, so there will be no one else in the institution who can consider the appeal accurately or fairly. In larger subject departments, there will be subconscious pressure to uphold original decisions rather than overrule a colleague and damage relationships. Also, presumably departments will standardise and moderate as part of internal quality assurance, so how can an appeal be independent from this? Surely schools and colleges will not have available specialists who were not involved in the assessment process to allocate appeals to?" (Teacher – responding in a personal capacity)

“There should be no appeal to the schools. If the Head of centre has done their quality assurance and signed off the grades, they are agreeing and assuring the grades. An appeal is against the judgement of the head of centre. If hearing an appeal, they are investigating their own decision. This is nonsensical. Students should only be able to appeal if they feel a clerical error has occurred.” (SLT – Senior leadership team)

Some comments raised practical issues with schools or colleges hearing appeals. For example, the issue of fees and funding was frequently raised.

“This is the most flawed part of the whole proposal and shows no understanding of the challenges faced by schools in different contexts. Schools in affluent areas will be inundated with appeals where parents do not see their child receiving the required grade. Where will the staff come from to manage these appeals? Teachers in schools will be delivering their lessons and continuing their usual work. How would schools recruit additional staff for this? Where would the funding come from for this? Isn't there already a body of staff who work for the exam boards who could fulfil this task? What will they be doing? Will the examination entry fees be refunded to schools in full to facilitate these arrangements? Schools' attention will be so focused on this process of assessment, grading, moderation, internal QA, external QA, appeals that it will leave little time for anything else.” (SLT – Senior leadership team)

A very large number of comments also proposed that appeals be heard by exam boards rather than schools. The reasons for these comments were similar to those discussed above, including the workload implications for schools and the concept of who is accountable for the grades. Some also made the point that by quality assuring and ‘signing off’ a school or college’s approach, the exam boards would assume responsibility.

“These suggestions are placing a lot of the emphasis on the school! What is the role of the exam board? They have saved a significant amount of money due to not paying examiners for two years yet no discount on exam entry, use this funding to assess students and handle appeals process to remove burden from the schools.” (SLT – Senior leadership team)

“Exam boards have expertise in handling appeals. They bring a level of objectivity. They will still be the accountable body for issuing results. Therefore all appeals should be dealt with by exam boards.” (Academy chain)

“Too much onus is being placed here on teachers and schools to be the accountable authority. If the exam boards are formalising the final grades, they must bear the responsibility of dealing with appeals like they would in any given year. If the exam boards have accepted the school's grade, they should deal with appeals asking the school for any further documentation they may need.” (Parent or carer)

“Schools will have more than enough to do in managing this pandemic. If you are choosing to use an external system of moderation and a robust system of quality assurance, then it is for the exam boards to manage appeals and not schools.” (School or college)

“Exam boards should provide clear guidance on exactly what evidence is required to issue a candidate with a grade. Having followed this guidance and awarded a grade, signed off by the Head of Centre, any challenge by the candidate should be directed to the exam board as the first and final means of appeal. The exam board is the only fair and independent arbitrator of whether, based on the evidence submitted, the grade issued is correct. I strongly disagree that schools should be tasked with considering appeals.” (Teacher – responding in a personal capacity)

A significant – although somewhat smaller – number of comments did not explicitly call for exam boards to assume responsibility for appeals, but instead focused on the principle of independence.

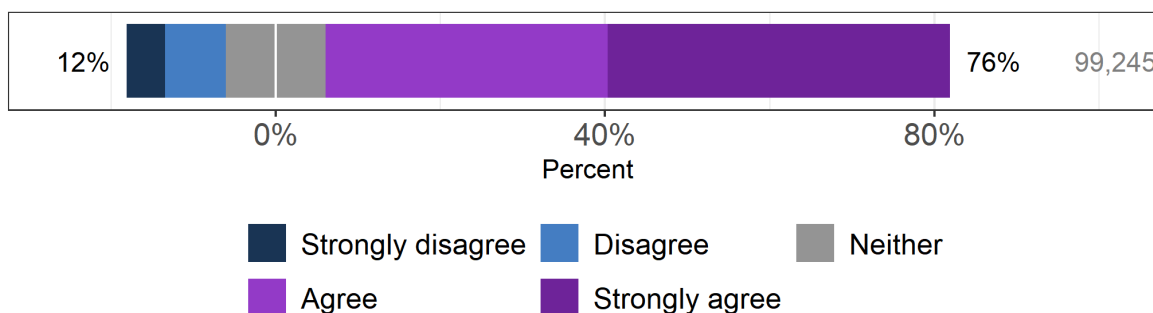
“You can’t ask the school and teachers to reassess themselves, appeals must be totally independent.” (Parent or carer)

“There must be an external element to the appeals process. Of course the school should be part of that process but if the school is applying nationally agreed and moderated standards, the extent to which they have done so must be considered externally. Otherwise, schools are judge and jury, which may seem a good position but is actually very unfair and insidious to the whole process.” (Teacher – responding in a personal capacity)

“You need an external person to deal with appeals. You cannot appeal to the person who made the decision in the first place because you're blatantly telling them they are wrong and why would they change the grade? However, some teachers will have biases and will be harsher so appeals are necessary.” (Student)

Q44. To what extent do you agree or disagree that the appeal should normally be considered by a competent person within the student's school or college who was not involved with the original assessment?

Figure 40: Q44 - overall responses



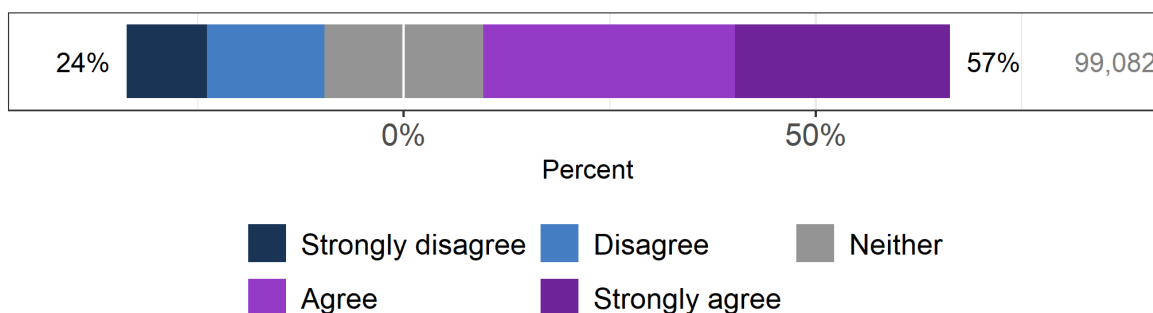
Q44 responses	Count	Percentage
Strongly agree	41,309	42%
Agree	33,992	34%
Neither agree nor disagree	11,982	12%
Disagree	7,319	7%
Strongly disagree	4,643	5%

Q44 total responses	99,245
No response	1,351
Survey total responses	100,596

All respondent groups were heavily in favour of this proposal other than employers, who were an outlier with 44% in favour and 38% opposed. However, only 16 respondents identified themselves as employers.

Q45. To what extent do you agree or disagree that a school or college should be able to appoint a competent person from outside of the school or college to consider the appeal?

Figure 41: Q45 - overall responses



Q45 responses	Count	Percentage
Strongly agree	25,893	26%
Agree	30,280	31%
Neither agree nor disagree	19,124	19%
Disagree	14,123	14%
Strongly disagree	9,662	10%

Q45 total responses	99,082
No response	1,514
Survey total responses	100,596

Responses to this question were mixed. Some respondent groups – for example parents and carers – were heavily in favour of the proposal, with 69% for and 15% against. Others, however, were more evenly balanced. Forty-two per cent of senior leaders were against the proposal and 41% supported it.

Respondents raised a variety of points about the use of a 'competent person', the majority of which were describing problems with, rather than support for, the proposals.

Those comments that were supportive did not provide many reasons and were often more supportive of an external competent person.

“The appeal should not go to someone within the school who was involved in the original grading. It must be to someone with a fresh perspective and can properly analyse the way the student was graded without bias.” (Student)

“Appeals need to be looked into by someone independent of the subject being appealed.” (Teacher – responding in a personal capacity)

“I think appeals should be discussed by an appointed external expert in collaboration with the subject teacher as just relying on a sole outside individual would be unfair because they do not know how the student performs in the lessons.” (Student)

Many comments noted the difficulty for schools in finding someone competent internally who was not involved in the original assessment. Many of these comments also noted that the competent person should be required to be a subject specialist.

“Finding a teacher who was not involved in some way in the original determination of a grade within the school is going to be impossible. For quality assurance purposes the whole department will be involved in moderation of papers and determining grades, therefore only someone outside the school can be a judge of this process.” (Teacher – responding in a personal capacity)

“Internal school appeals may be difficult for small schools, eg, we only have one History teacher (etc) so a History appeal would need to be external (ie, we would need to ask another school to assist us) and that could be difficult, especially if this is during the holiday period.” (School or college)

“Any competent person within the organisation with secure understanding of a subject would have been involved in the initial awarding of grades. This means there will be nobody within an organisation that has sufficient understanding of the intricacies and requirements of a subject that was not involved in the initial awarding your grades so they could assess the appeal. We cannot assume that every school can find somebody of such a standard with sufficient knowledge of each subject available to consider appeals. Non-subject specialists will end up being used which will devalue the whole process.” (Teacher – responding in a personal capacity)

Just as many comments, however, raised concerns at the prospect of a competent person from outside of the school or college, focusing on the difficulty of locating such people and their potential limitations.

“It’s difficult to decide that an external person should look at the appeal and the student’s grade as it can be largely based on knowing a student’s academic abilities rather than just grades.” (Student)

“It is very difficult to see how schools will be able to recruit independent people to scrutinise at subject level the work that candidates have done.” (School or college)

Other respondents raised basic issues such as uncertainty as to the definition of a ‘competent person’ and how a person’s competence would be approved and monitored.

“How exactly do schools appoint a “competent person”? How is that monitored? Open to corruption.” (Teacher – responding in a personal capacity)

“A ‘competent person’ is subjective.” (Student)

“More clarity is required regarding what constitutes a competent person and how this is paid for.” (School or college)

“Appointment of an independent person is fraught. Most/all teachers in a department are involved in teaching and assessing GCSE. How does a school quality control an external assessor?” (SLT – Senior leadership team)

Some respondents suggested that an external competent person should be supplied or nominated by a third party such as the exam boards, Ofqual or the Department for Education.

“Will exam boards supply us with names/contacts of another person to reach if there is an appeal that needs to be checked by a person outside of the school? Otherwise, this alone could be a challenge.” (SLT – Senior leadership team)

“It would be useful for exam boards to allow for a bank of moderators for schools where there are single teacher departments.” (Teacher – responding in a personal capacity)

“With reference to the point regarding 'a competent person outside the school' to consider the appeal... How would this be organised or centralised? Is this suggesting additional involvement from the exam boards or DfE? Further clarification on this is needed in order to be able to respond appropriately.” (SLT – Senior leadership team)

Others suggested that a system of ‘peer review’ might be possible, with teachers from other schools acting as competent people for each other.

“I disagree with the idea that a centre can appoint someone outside the centre for appeals. The term 'a competent person' is too general. I would agree if it was a teacher from another school or college.” (Teacher – responding in a personal capacity)

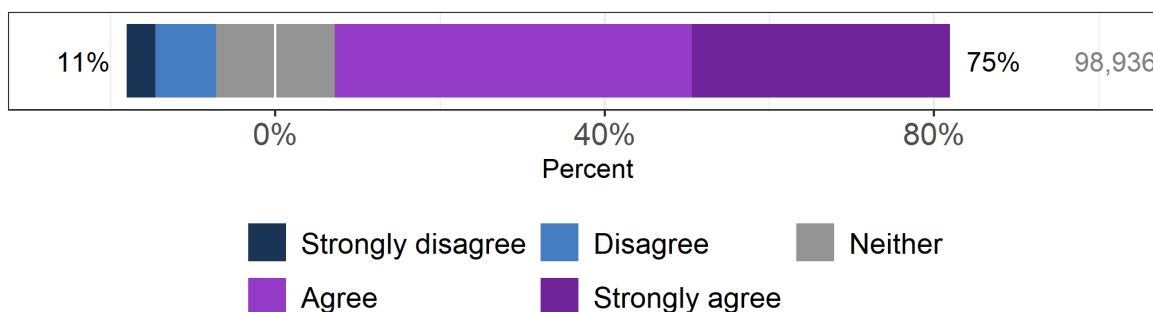
“I don’t think schools should handle appeals from their own students as they are naturally biased and so unlikely to decide fairly. Schools could look at the appeals of other schools in the first instance?” (Parent or carer)

“It would be preferable that a teacher or staff member from another school is used over one from the same school no matter if they have any involvement in the exam to avoid any slight chance of unconscious bias.” (Student)

“The independence of the reviewing body/individual is a key principle of any appeals process and should apply to any centre-based appeals. However, our conversations with centres suggest that some of them struggle with the practicalities of sourcing such an independent overview. It may be that schools with only one subject teacher or shared teacher resource could work with other schools to achieve this, or go further and share a common process. This might help small schools in particular where key staff such as the Head of Centre are absent due to Covid or other health issues.” (Awarding body or exam board)

Q46. To what extent do you agree or disagree that a grade should only be changed if it is found not to represent a legitimate exercise of academic judgement?

Figure 42: Q46 - overall responses



Q46 responses	Count	Percentage
Strongly agree	31,034	31%
Agree	42,903	43%
Neither agree nor disagree	14,281	14%
Disagree	7,285	7%
Strongly disagree	3,433	3%

Q46 total responses	98,936
No response	1,660
Survey total responses	100,596

Only 2 respondent groups – awarding bodies or exam boards, and employers – differed significantly from the overall trend in the chart above. In both cases there were slightly more respondents who supported rather than opposed the proposal, but the balance was much more even.

Relatively few comments addressed this question explicitly. Of those that did, a significant proportion indicated concern about the definition of ‘a legitimate exercise of academic judgement’, either because the respondent did not know what it meant, or in some cases, worried that other people might not know or have different opinions about what it means.

“We are very concerned about parents/pupils manipulating the ability to appeal their grade, either wilfully or because they have not understood how the process

will work, especially in terms of what 'legitimate exercise of academic judgement' means." (School or college)

"Q46 - "a legitimate exercise of academic judgement" is so open to interpretation that this cannot be the criteria. Legitimate in whose view?" (Parent or carer)

"A legitimate exercise of judgement" can be defined in a plethora of ways. it's a very vague term. Teachers would know their students and especially their capabilities. Many students can perform far better outside of exam conditions than inside of exam conditions as a result a teacher may give a grade that is a reflection of a student in a higher boundary and thus the exam board may not accept it." (Student - private, home-educated of any age)

"The process of this becomes unmanageable if you have an appeal for the appeal based upon statements such as 'legitimate exercise of academic judgement'. Parents and students will simply exploit the language, who defines 'legitimate'?" (SLT – Senior leadership team)

Some respondents said that there should be wider grounds for changing a grade, including factors relating to individual students' specific circumstances or procedural errors at schools or colleges.

"A legitimate exercise of academic judgement' must take into account more factors than pure academic achievement. Many children, who would otherwise perform very well, have been adversely affected by the events and should not be penalised. The definition of 'academic judgement' is crucial in this context." (Parent or carer)

"You can't just restrict the first appeal to grounds of legitimate exercise of academic judgement - there needs also to be procedural grounds, eg, administrative error, work incorrectly attributed, misinterpretation of exam board requirements, lack of reasonable opportunity to sit assessments, etc." (Parent or carer)

"A grade should only be changed if it is found not to represent a legitimate exercise of academic judgement and factors affecting their performance should

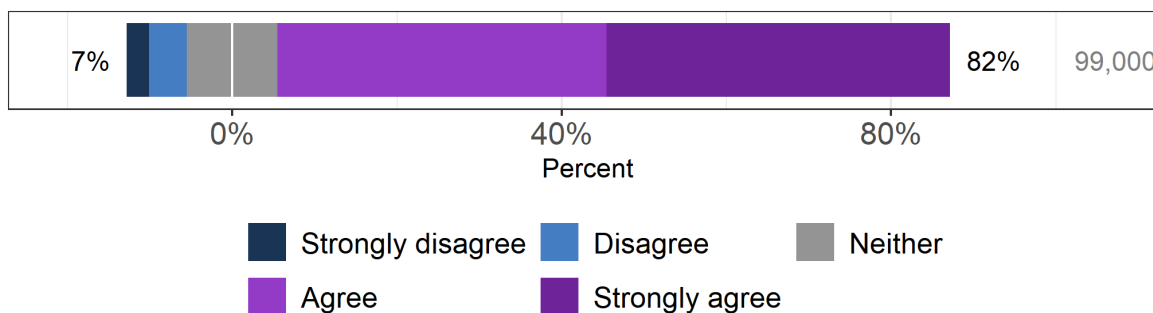
be considered such as extenuating circumstances like mental health and close bereavements.” (Student)

Others said that if a school is correctly carrying out its processes and its internal quality assurance, there should by definition be no judgements which are not legitimate.

“We feel strongly that any appeals should be submitted on the basis of the process rather than “legitimate exercise of academic judgement”. The assumption must be that the processes employed by schools to secure robust academic judgement are such that they should not necessitate appeal.”
(Academy chain)

Q47. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not follow the exam board's requirements when it assessed the student's performance?

Figure 43: Q47 - overall responses



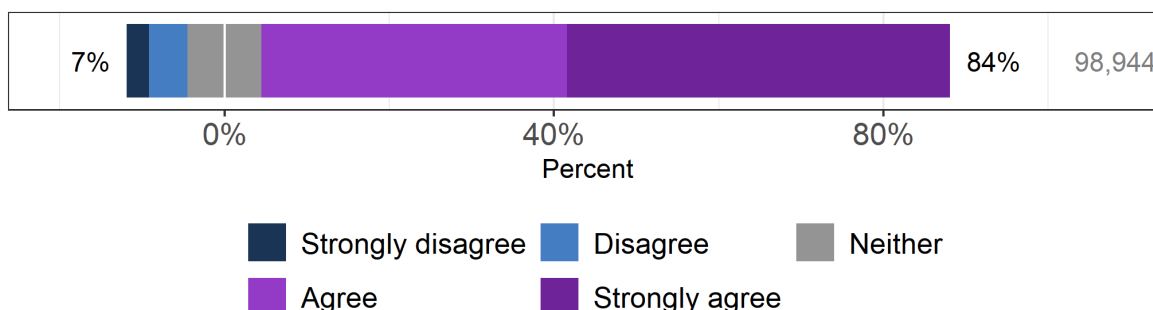
Q47 responses	Count	Percentage
Strongly agree	41,301	42%
Agree	39,569	40%
Neither agree nor disagree	10,864	11%
Disagree	4,556	5%
Strongly disagree	2,710	3%

Q47 total responses	99,000
No response	1,596
Survey total responses	100,596

All respondent groups were heavily in favour of this proposal, with no significant variation.

Q48. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not properly consider the student's appeal?

Figure 44: Q48 - overall responses



Q48 responses	Count	Percentage
Strongly agree	46,071	47%
Agree	36,696	37%
Neither agree nor disagree	8,844	9%
Disagree	4,652	5%
Strongly disagree	2,681	3%

Q48 total responses	98,944
No response	1,652
Survey total responses	100,596

There was slightly more variation between respondent groups in this question when compared to question 47. In particular, exams officers and managers and member of senior leadership teams showed lower rates of support for the proposal at 53% and 52% respectively. These are the groups most likely to be heavily involved in school and college appeals processes.

There were relatively few comments from respondents which were explicitly concerned with these proposals. One of the most frequent comments was that it is unlikely that many students would know or be able to ascertain whether or not their school or college had correctly followed the exam board's requirements, either

regarding the assessment of the student's performance or the consideration of an initial appeal.

"We feel that students are not best placed to judge whether their centre had followed the procedural requirements when assessing the standard of performance or when considering the appeal, so this would be a difficult basis for them to appeal on. However, they should be able to appeal beyond their centre if they think there is some administrative error that has not been picked up on."
(Private training provider)

"Ability of candidate to appeal to exam board that procedure has not been followed - the candidate will have no way of knowing if the procedure has been followed correctly or not, so has no real grounds for appeal and will do so simply because they are dissatisfied with the original answer. This is a bad idea."
(Governor)

Others make the point that if the exam board has already quality assured the school or college's procedures, then appeals on this basis seem pointless.

"If exam boards moderate how schools have followed procedures what is the point of students being able to appeal to them on grounds that schools didn't follow these? Exam boards will know that they already have." (SLT – Senior leadership team)

"If the school has been properly trained, and rigorously standardised, then the students should NOT have grounds to appeal that procedure has not been followed. Students cannot possibly be in possession of evidence of the school's internal discussions and marking standardisation decisions." (Teacher – responding in a personal capacity)

A number of comments express concern at the number of appeals this proposal could generate.

"There would have to be a high bar for evidence required for this appeal to be made to exam boards to deter those who wished to 'have a go' on the off chance." (School or college)

"There should be an internal appeals process in the first instance to consider the appeal and explain the processes used to any students wishing to appeal/or to explain to students why their appeal will not be considered. Otherwise the exam

boards could find themselves inundated with appeals which have no grounds because the school can evidence that procedures were followed.” (Exams officer or manager)

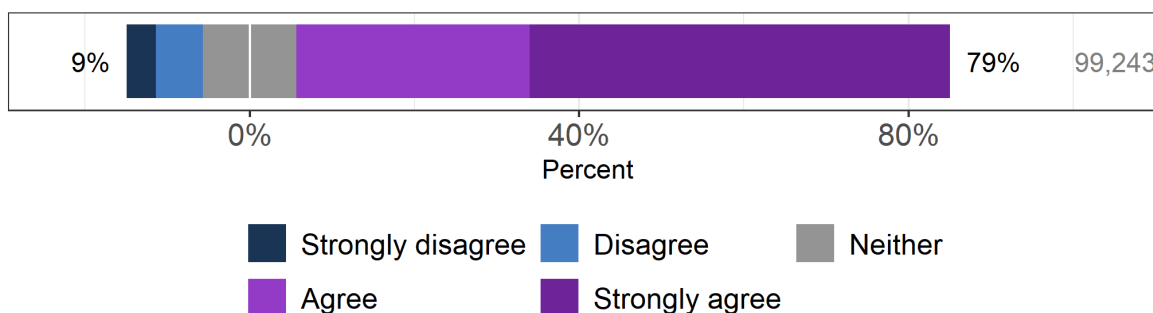
The exam boards acknowledged that an avenue of appeal to them should be available, but some said that this would only be practical if appeals came via students’ school or college.

“While we agree with aspects of the proposals in questions 47 and 48, namely that exam boards in limited scenarios should act as a further route of appeal for students beyond them asking for their school to review their grade, we must stress that the appeal must nevertheless be submitted by the school. Our systems do not have the data or capability to interact with candidates at this scale, as our processes and relationships are with the centre. It is centres and not students, therefore, who must log students’ appeals with exam boards if they are dissatisfied with their centre’s review.” (Awarding body or exam board)

“Our recommended solution is that student appeals are submitted via the centre. This will streamline the process for students as the centre will have already validated the student’s identity and the centre will also have a record to show that the student has completed the centre’s own review process and can confirm this to the exam board. This approach also means we will be able to refine our existing technology solution and focus our resources on updating this to reflect the specific bases for appeals in 2021 in a timely way. The updating of the system would include the provision of a distinct category for student appeals. This approach seems to offer a quicker and easier route for students to appeal to their exam board.” (Awarding body or exam board)

Q49. To what extent do you agree or disagree that we should seek to bring forward results day(s), in order for appeals to begin earlier?

Figure 45: Q49 - overall responses



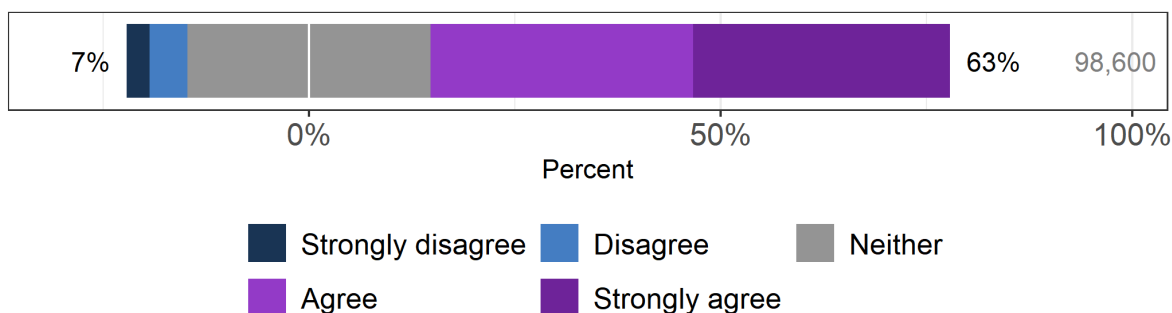
Q49 responses	Count	Percentage
Strongly agree	50,682	51%
Agree	28,083	28%
Neither agree nor disagree	11,303	11%
Disagree	5,686	6%
Strongly disagree	3,489	4%

Q49 total responses	99,243
<i>No response</i>	1,353
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q50. To what extent do you agree or disagree that if results days are brought forward, we should seek to decouple when a student is informed of their results, and universities are informed of their formal result for the purpose of admissions decisions?

Figure 46: Q50 - overall responses



Q50 responses	Count	Percentage
Strongly agree	30,815	31%
Agree	31,382	32%
Neither agree nor disagree	29,160	30%
Disagree	4,475	5%
Strongly disagree	2,768	3%

Q50 total responses	98,600
No response	1,996
Survey total responses	100,596

Every respondent group was heavily supportive of the proposal apart from universities and higher education institutions, which were heavily opposed.

There were very many comments in favour of both bringing results days forward and decoupling students' results from HE admissions results. Many comments conflated the two proposals or did not clearly distinguish between them. However, there was not very much variation in the themes expressed by those who supported the proposals.

Most of the comments expressing support for these proposals did so on the basis of giving time for appeals to be concluded before higher education institutions receive

finalised student results. Many of these comments drew comparison to the situation in 2020.

“I think that results day should 100% be brought forward because last year, the appeals process was shambolic and if you gave it more time this year more students may be able to sort out their grades and hopefully get into the uni of their choice.” (Student – private, home educated)

“Bringing forward results day would make things so much easier. Not only will we actually be able to enjoy our holidays without constantly worrying about our next steps, but it will also give us the opportunity to sort arrangements out with unis if need be.” (Student)

“Bringing forward the results day(s) which should be possible given the proposed adjustments made to assessments would allow time for students and institutions to deal with any appeals robustly and thoroughly without added time pressures.” (Teacher – responding in a personal capacity)

“Decoupling results from students receiving them and universities processing them will allow a time gap for any appeals to be resolved before places are offered.” (School or college)

Although fewer in number, comments which raised concerns about the proposals included many more themes and issues. The most widespread and significant were the comments about the potential effects of the proposals on teacher workload, and in particular the potential for the appeals process to take place largely in July and August during what would normally be teachers’ holidays.

“I agree that results day should be moved to within the school term, however the appeals and university information will also need to happen then within term time. School staff, and particularly school leaders, have worked since last March with very little break over holidays (sorting grading, sorting microschoools, sorting appeals, sorting FSM provision, sorting laptop provision, sorting covid testing centers). We need a summer break and this will not happen if we have to spend the whole summer dealing with appeals and university admissions!” (SLT – Senior leadership team)

“Have you considered the role of exams officers? They deal with all appeals and are usually only employed term time only. Early results will mean they do not get summer holidays. Is the government going to reimburse schools for overtime payments? I personally worked 94 hours overtime last year with no help from the government. Our small rural school is financially on its knees and has no money to pay such costs from their budget.” (Exams officer or manager)

“There is a risk with results in July following by appeals that senior teachers, who have had little break since March 2020, will not benefit from any summer holiday. Consideration must be given to the mental health of school leaders.” (School or college)

Other respondents expressed concern that by bringing results days forward, time would be taken away from the initial assessment and quality review processes, and from teaching time before that.

“If results days are brought forward, this leaves less time for procedures to try and ensure there is the greatest consistency in the way grades are awarded in the first place. The more rigorous that process is, the less likely there will be sound grounds for appeal.” (Teacher – responding in a personal capacity)

“Bringing results day forward in order to prepare for appeals is important and a good idea. However, students have lost a large chunk of time already to put together work to be submitted as evidence. It is vital that students can solidly back up their grade with work assessed by teachers, and by bringing forward results day, you are knocking more time off for them.” (Student)

“If the results date is brought forward, there has to be sufficient time for the marking of assessments to take place. This all seems extremely onerous on the teachers and far easier for the exam boards. Will teachers be paid the usual examiner's fees for the marking?!” (Teacher – responding in a personal capacity)

“Sounds sensible, as long as bringing forward results day does not mean reduced time for teaching & learning - they were all promised an extra 3 weeks - this should not be taken away from them.” (Parent or carer)

Higher education institutions raised a number of concerns with the proposals, including the risk that decoupling results would lead to more appeals, and that

students in possession of their results would put pressure on universities to confirm their places before universities had officially received their results.

“Even if the results issued to students are clearly badged as interim or provisional results, we expect that there will be unmanageable pressure put on universities to make decisions based on those interim results rather than wait until the formal results are provided through UCAS. We are also concerned that while universities may be expected to wait until the formal results are published before confirming places, it is possible that some may make decisions outwith the UCAS process which could undermine the integrity of the system. [...] We are also concerned that decoupling would lead to increased appeals. Normally, many students have their university or college place confirmed even if they didn't quite meet their offer conditions, but in this scenario students may feel they have to appeal their grades in case that doesn't happen, several weeks later. The other risk is that the student may look for a place at another university with the interim grades they have been given, when they may well have been accepted at their original choice anyway. The lack of clarity creates considerable risk of disadvantage, especially to the widening access students we want to prioritise, who are likely to have less access to good quality advice.” (University or higher education institution)

“Decoupling the exam results and confirmation of university places would be a disaster and lead to undercover clearing operation where HEIs will be contacted by the applicants as soon as they receive their grades seeking confirmation of their place. This would lead to uncertainty for the students and would remove transparency the OfS is keen to instil in the sector.” (University or higher education institution)

“Decoupling results and HE decisions could influence the number of appeals [...]. Decoupling increases the risk of anxiety and mental health issues for students [...]. Risk of an inconsistent experience for students: under the proposal within the consultation document, universities and colleges will be free to confirm students' places at the point students receive their results [...].” (Other)

A number of respondents said that it was important for GCSE and A level results days in England to remain aligned with other qualifications, including GCSEs and A levels in Wales and Northern Ireland, as well as similar qualifications such as international A levels and BTECs.

“Results days should remain in line with the results days in Wales - considering the exams regulator Ofqual works closely with Qualifications Wales on awarding

grades. Therefore, a joint decision should be made on when to publish results otherwise English students may receive preferential treatment over Welsh students when colleges and universities consider applications.” (Student)

“Concern with decoupling of information - this needs to be the same for BTec and A level students - not just for A Levels as they should be given information about grades at the same time and without being disadvantaged in relation to university places/admissions.” (Parent or carer)

A range of other views occurred less frequently, including the fact that some teachers or students will already have booked holidays based on the expected results days, the importance of a traditional results day as a rite of passage, and the fact that many students only decide whether or not an appeal is necessary once they know if they have been accepted or rejected.

“Do not change results days. There is already enough uncertainty. People have made plans for a much needed summer holiday, be it at home, or if restrictions are lifted, with family in other parts of the world. Give people a rest and keep some sort of regularity. Appeals took up the whole first half term of the academic year. Trust teachers to make the final decision.” (SLT – Senior leadership team)

“If you change results day, you need to publish it asap. Holidays from last year have been re arranged to this year taking into consideration the normal results day. If travel is permitted people will be organising this sooner rather than later.” (Parent or carer)

“Results should be issued in August on normal results day, these students have already been denied much of their usual experiences and results day is a rite of passage.” (Parent or carer)

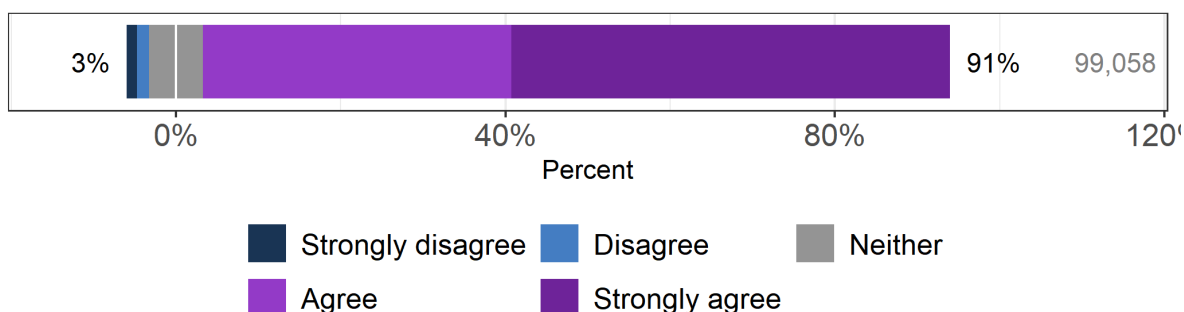
A number of comments suggested that some respondents did not understand the question, in particular asking what the term ‘decouple’ means.

“Some of these questions are very unclear and too long/overly wordy - what does the “decouple” question even mean?” (Teacher – responding in a personal capacity)

“You need to explain what 'Decouple' means.” (Student)

Q51. To what extent do you agree or disagree that the exam boards should provide information for schools and colleges on how they should handle appeals?

Figure 47: Q51 - overall responses



Q51 responses	Count	Percentage
Strongly agree	52,783	53%
Agree	37,084	37%
Neither agree nor disagree	6,493	7%
Disagree	1,431	1%
Strongly disagree	1,267	1%

Q51 total responses	99,058
No response	1,538
Survey total responses	100,596

All respondent groups were very heavily in favour of the exam boards providing information for schools and colleges on how they should handle appeals.

The only comments that disagreed with the proposal were from respondents who did not accept the premise of the question, and said that they did not believe schools should be handling appeals and so would not require information or guidance.

“The exams board should not be involved at all, the trust was put in the teachers and not the exam boards.” (Student)

“Exam boards should administer these appeals, not schools.” (Teacher – responding in a personal capacity)

Many comments affirmed the importance of guidance for schools, and many also went beyond the focus of the question and referred to the importance of guidance and clarity for students and parents and carers as well.

“Having clear protocols from the exam boards is key. Having that information as early as possible is paramount to this running smoothly.” (Teacher – responding in a personal capacity)

“We agree that it will be important to ensure centres are supported with clear guidance on how to deliver reviews where students have reason to believe there has been an error in how their grade has been determined.” (Awarding body or exam board)

Some comments also emphasised the importance of a single appeals process rather than difference guidance from each exam board.

“Students should be issued with information about what constitutes grounds for an appeal and how to go about making one (both so they can do so if they need to and to reduce the time taken in the process for all parties involved - if done properly, they should be able to be handled more efficiently).” (Student)

“Standard processes and paperwork across all exam boards would be needed to ensure that appeals are dealt with professionally and competently within schools/colleges.” (Exams officer or manager)

Some respondents suggested that guidance should be the responsibility of Ofqual or DfE rather than exam boards.

“Should be Ofqual/DfE not exam boards that gives advice on handling appeals.” (SLT – Senior leadership team)

“Appeal procedures should be enforced by Ofqual or JCQ and not exam boards, as this leaves it open to work differently across boards.” (Exams officer or manager)

Q52. Do you have any comments on the proposed appeal arrangements?

There were 16,214 responses to this question. The vast majority of them related specifically to one or more of questions 41 to 51 above and have been covered in the analyses of responses to those.

However, some respondents took the opportunity to raise a number of other points in relation to the appeals process which do not clearly belong with any of the questions related to our proposals. The majority of issues which were raised in this manner were concerned with limiting the number of appeals in some way, and in particular with discouraging high volumes of speculative appeals.

A significant number of respondents asked about the opportunity to take an exam as a form of appeal, often referring to the similar arrangement in 2020 when the exam boards offered an autumn series. Some respondents went so far as to suggest an exam series later in the year should be the only available route of 'appeal'.

"There is no way that appeals can work with this system. An autumn exam season is the only way that pupils who think their grade was unfair can appeal the result." (Exams officer or manager)

"Students should also have the opportunity to take the exam in October if they are not happy with their grade." (Teacher – responding in a personal capacity)

"Students should have the option to do an exam in a subject if they believe their grade was unfair and their appeal is denied." (Student)

"In my opinion a similar model to 2020 would work in that if a student did not like the grade they could resit in November. This has worked well this year at our school and would be welcomed." (SLT – Senior leadership team)

A number of respondents simply voiced an opinion that no appeals should be allowed this year, although some added the caveat that this was only if processes were being followed correctly.

"Students should not be allowed to appeal. This whole system of appeal undermines teachers, implies that teachers don't know how to assess students, are unable to be professional." (Teacher – responding in a personal capacity)

“I don't think students should be able to appeal a grade. The grades awarded will have been considered against their performance. A lot of guidance will have been given to teachers so that their assessment can be made fairly. That should be enough.” (Parent or carer)

“If robust systems are put in place in school where every child is considered thoroughly for every subject, and quality assurance takes place appeals are not needed.” (Teacher – responding in a personal capacity)

Questions about fees for appeals arose in a number of ways. Numerous respondents said that the appeals process should be free, usually on the basis of equal opportunity for all students.

“All appeals must be free of charge in order to provide equal opportunity to all students in getting the grade they deserve.” (Student)

“Appeals should not come with any monetary charge as it grossly favours the richer kids, who will already have had advantages.” (Parent or carer)

Others, however, said that a fee should be charged, either to cover the school or college's costs or in order to deter speculative applications for appeal.

“Broadly in favour, but fear that in a few cases parents/students could make appeals entirely without merit. There is a refundable fee for exam board appeals, this should be the same in schools.” (SLT – Senior leadership team)

“We would propose that the appeals process is kept very simple. There should be a charge to students for the appeal (standard across all schools) which should be used by the school to cover the costs of the appeals process.” (School or college)

A number of respondents indicated that grade protection should be in place for appeals this year, so that students' grades could not go down on appeal. Others, however, said that there should be the chance that a grade will go down in order to discourage speculative appeals.

“Appeals should be unable to lower a student's grade. Not only to encourage appeals as to achieve fairer grading, but also to reflect the difficult circumstances in which much of the assessment has taken place in.” (Student)

“In a normal year, a student's grade can go down on the back of an enquiry about their result, as well as up. Presumably this would be the same this year? It will have a substantial impact on the demand for appeals (some of which may be speculative in nature), and hence the logistical viability of whatever system is put in place. It will also mean that there will be greater capacity in the system to deal with the appeals that are submitted.” (School or college)

The transparency of each grade awarded was a subject which came up frequently, in the context of encouraging specific rather than speculative appeals.

“It should be clear to the student how the teacher has made the decision based off the evidence of mocks, mini exams and any other source used. The earlier this is done the easier it is for the student to appeal in the case of improper assessment.” (Student - private, home-educated of any age)

“This needs to be transparent at every step. If teachers are competent to assess and apply grades, and I believe they are, they should also be prepared to be challenged and their reasoning understood. Most appeals should be settled easily by a review of the assessment approach and underlying evidence in any particular case. Appeals to exam board should largely be issues of process adopted in reaching assessment, and validity of underlying evidence.” (Parent or carer)

“Appeals should be considered, but as long as centres have evidence to back up the students' grade, or reasons behind why a grade was given, the appeal process shouldn't be too arduous.” (Teacher – responding in a personal capacity)

Some respondents referred relatively generically to ensuring that the grounds for appeal were clear but limited.

“I think many students will want to appeal grades with no true reason or evidence. This appeal process should be accessible under strong grounds only.” (Teacher – responding in a personal capacity)

“Grounds for appeal need to be very clearly defined and consistent. The majority of appeals will be against the teacher judgement (or marking) in addition to the 'breadth' of other evidence that may or may not have been taken into account - this is likely to be very subjective and time consuming.” (SLT – Senior leadership team)

“Do not make appeals too easy or you will have a free for all and all children will get the top grades and the results will be valueless.” (Parent or carer)

A number of respondents asked how private candidates would be treated in the appeals process.

“There has been no consideration given to how private candidates can appeal. This lack of consideration for a group of students is discriminatory.” (Parent or carer)

“How do private students appeal grades with no support from schools?” (Student – private, home educated of any age)

“This again does not make any provision for EHE or private candidates. It refers consistently to schools and colleges and no other form or body for assessments. It is alienating for the whole community of many thousands of students.” (Teacher – responding in a personal capacity)

A small number of respondents noted the potential for elements of our proposals to result in perverse incentives.

“Allowing or encouraging appeals will lead to grade inflation as teachers will not want to endure this process so will err on the side of generosity. There has not been sufficient time this academic year for students to know what a realistic grade for them is, so will likely feel they have been judged harshly.” (Teacher – responding in a personal capacity)

“Appeals could be extensive and this provides an incentive for schools to over-mark, so a strong system of moderation and sampling is needed to promote fairness and confidence in the grades.” (Parent or carer)

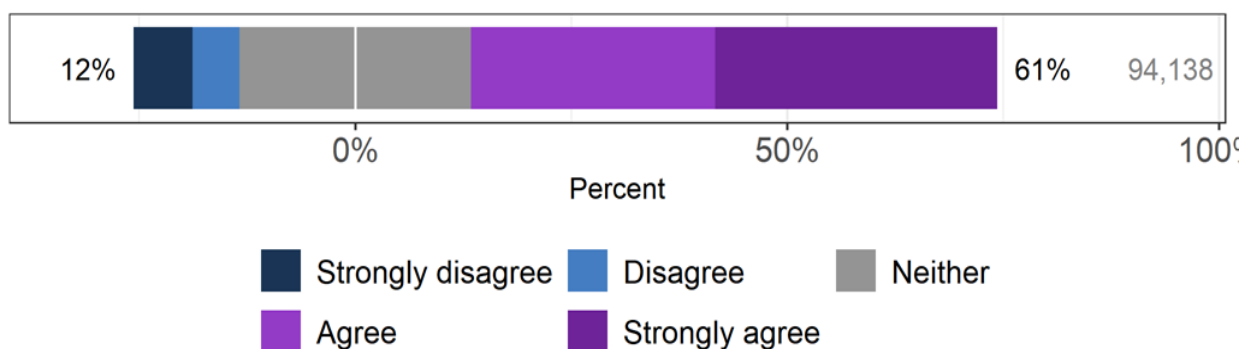
“Decoupling results day from university offers day will result in HUGE numbers of unnecessary appeals. This leads to a perverse incentive to teachers to award the university offer grades to each candidate.” (School or college)

“The right to appeal is important. But it will create a set of unintended incentives that will distort the system. The effect of these incentives is likely to cause so many problems that I actually feel we would better off without any appeals process. If a student/parent has a right to appeal and they believe that an appeal could increase the grade awarded, there is an incentive to appeal every grade. If schools want to minimise the volume of appeals because they want to finalise the process and deal with everything before deadlines and timescales outlines, they will err on the side of generosity when awarding grades. This might reduce the number of appeals, but it creates a perverse incentive that will lead to grade inflation.” (SLT – Senior leadership team)

Private candidates

Q53. To what extent do you agree or disagree that private candidates should be able to complete the papers set by exam boards, with them marked by the exam boards?

Figure 48: Q53 - overall responses



Q53 responses	Count	Percentage
Strongly agree	30,748	33%
Agree	26,644	28%
Neither agree nor disagree	25,188	27%
Disagree	5,140	5%
Strongly disagree	6,418	7%

Q53 total responses	94,138
No response	6,458
Survey total responses	100,596

The majority of respondents to this question (61%) either strongly agreed or agreed that private candidates should be able to complete the papers set by the exam boards, with them marked by the exam boards (Option A).

Sixty-five per cent of private, home-educated students agreed, while 25% did not. There were no respondent groups in which more people opposed rather than

supported the proposal. However, of the 4 exam boards who offer these qualifications, 2 agreed and 2 disagreed or strongly disagreed.

Those in favour of this option said that private candidates should be treated in the same way as other students.

“As a tutor who works with 100s of private candidates, and assisted many during last summer's exam series, I believe that it is imperative that private candidates are treated in a similar fashion to those in mainstream education. I strongly disagree that they should sit examinations as normal (even when it is an IGCSE) because it unfairly assumes that their learning has not been affected by the pandemic. Many students have had their situations entirely disrupted. Many are used to face-to-face lessons which have now been cancelled, or used to a schedule at home which has now been altered due to changes in the way their parents are working. Furthermore, when the government announced that examinations wouldn't run as normal, there was no caveat that this didn't apply to a certain group. As such, private candidates have been working under the assumption that they will be treated with the same fairness as everybody else.”
(Other representative or interest group)

While many respondents expressed a preference to work with a school or college directly, and therefore to benefit from the same arrangements as mainstream students, they accepted that this might not be possible. Respondents said the option to complete exam board set and marked papers would provide some objective evidence for private candidates who do not have a relationship with a school or college, which would enable them to receive a grade this summer.

“Private candidates should be given the option to sit the 'mini exams' and be given a CAG if the school is willing to assess them, based primarily on the results obtained from the 'mini exams', along with any other formal evidence, where available from the school. If this is not possible for the candidate, then they should have the option to sit papers set by exam boards in schools and the papers should be marked externally by the exam boards (option a).” (Student – private, home-educated of any age)

“It is essential that private candidates be given the opportunity to complete the papers set by exam boards, as this will in many cases form the key piece of evidence on which a grade for a private candidate could be based ... For private candidates who have no prior relationship with a centre, a single assessment, set by the AO [awarding organisation] and conducted under supervised conditions, will be the most objective basis on which a grade could be based in the absence of formal examinations.” (Awarding body or exam board)

“I have asked all the local schools and colleges if I can do my A level with them and they have all said no. If option b) were chosen I would be left without a grade having paid lots of money to sit the A level privately. Then I may not be allowed a place at university. This would be very unfair given it was based on the pandemic instead of individual knowledge or understanding. The assessment should be in line with how schools and colleges are assessed, but with flexibility for the variety of candidates who are private or home-educated. Some elements could maybe be online?” (Student – private, home-educated of any age)

Some respondents would welcome the use of exam board set papers as they considered these would offer a more reasonable form of assessment given the disruption caused by the pandemic. A few commented that it would be too risky to rely on a full examination series going ahead.

“Normal full syllabus exams for private candidates are grossly unfair. Exam boards should set exams for private candidates but to ensure a level playing field with those in schools and colleges, the syllabus to be examined must be greatly reduced and the candidates advised which topics they will be examined on. Of all students private candidates are the ones that were most unfairly treated and left disregarded last year, being left with no grades and not able to progress to the next stage of their education. This cannot happen this year as many did not take the autumn exams and are reliant on these summer results to enter university.” (Other)

“The option of completing exam papers to be marked by exam boards or working a school/centre seem to be the best options. This would most likely work for all candidates and take the pressure and stress of having to sit formal exams which may or may not go ahead depending on the public health situation.” (Student – private, home-educated of any age)

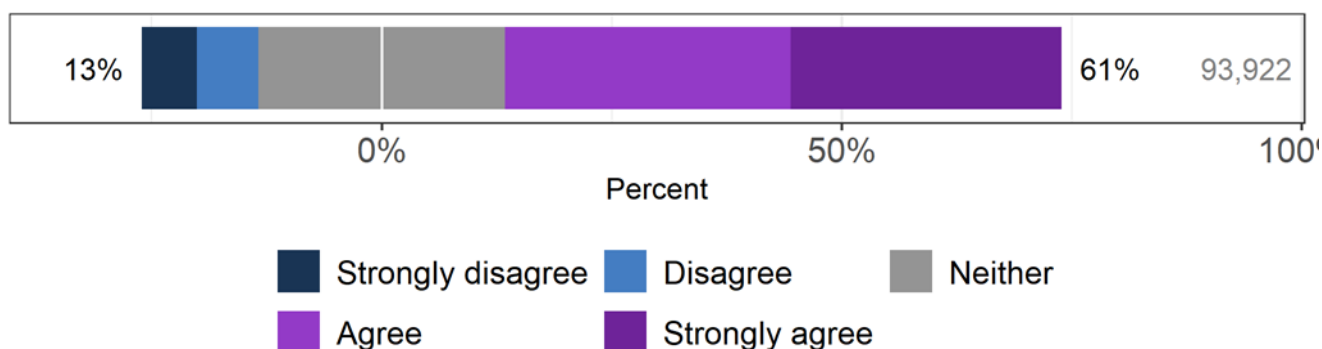
Some private, home-educated students disagreed or strongly disagreed with this option in favour of sitting exams in the summer (question 55). They noted that while the exams were in a familiar format, they were unsure what would be the format or content of the exam board-set papers, or if the papers would offer them the opportunity to respond to questions on topics they had studied.

“Repurposing the papers prepared for teachers as a means of private candidate assessment can be made to work to an extent. However, it appears to have no advantages compared to exams (besides a superficial similarity to the assessment used for schoolchildren) and has several serious drawbacks: (a)

without access to the support and training that exam boards will provide to teachers, home-educated students will be less able to prepare for assessment, (b) if teachers have discretion in which papers to use and home-educated students do not, the latter will be disadvantaged, (c) many home-educated students rely heavily on past papers for reliable measurement during preparation, since they do not have teachers to assess and guide them. Any deviation from the usual exam format makes the use of past papers less effective, (d) many of the mechanisms in place to support exams, such as access arrangements, do not have clear analogues in the proposed system of reusing papers designed for teachers.” (Other representative or interest group)

Q54. To what extent do you agree or disagree that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college's other students?

Figure 49: Q54 - overall responses



Q54 responses	Count	Percentage
Strongly agree	27,698	29%
Agree	29,143	31%
Neither agree nor disagree	25,178	27%
Disagree	6,306	7%
Strongly disagree	5,597	6%

Q54 total responses	93,922
No response	6,674
Survey total responses	100,596

The majority of respondents to this question (61%) either strongly agreed or agreed that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college's other students (Option B). Sixty-eight per cent of private, home-educated students agreed, while 20% did not. All 4 exam boards who offer these qualifications agreed or strongly agreed.

As with question 53, respondents commented on the need for a single system that worked fairly for all students.

“Option b is by far the most fair option as private candidates and students need to be assessed in exactly the same way to ensure grading of both private

candidates and student is done in a fair and equal manner. This would involve both parties providing similar evidence whether this is coursework-style homework set by the exam boards, mocks completed in a private setting or externally set exams the method must be the same for both groups.” (Student – private, home-educated of any age)

“I home educate one child and the other is at college so I can see both sides of the argument here. My home-educated child, although having not had her access to learning interrupted (she is enrolled in an online school) has still been impacted by the lockdown as her home environment has become more challenging and her mental health has been impacted. I therefore feel that giving her access to the same provisions as school-attending pupils receive would be fair.” (Parent or carer)

There were lower levels of support from teachers responding in a personal capacity (54%), schools and colleges (44%), academy chains (44%), and senior leadership team respondents (40%). Thirty-seven per cent of exams officers and managers agreed or strongly agreed with the proposal, however more (42%) either disagreed or strongly disagreed.

Respondents from these groups expressed concern that schools would not have the time or resources to be able to take on additional students on top of managing arrangements for their own students. They said they would not have the same bank of evidence or data to support decisions about grades for unknown students. Some respondents said that it would be difficult for schools to integrate private candidates because they might not necessarily have covered the same parts of the course content as their own students. Similarly, private, home-educated students were worried that they would be required to take exam board-set papers on topics that were unfamiliar to them.

“We had to withdraw private candidates last year due to not being confident we could adhere to the regulations for them last year. This year we may struggle with the workload of incorporating them into the assessments alongside our internal candidates. We would be able to support them physically sitting an exam which is then sent off to be marked as this would not impact on teachers’ workload.” (SLT – Senior leadership team)

“Do not add to the enormous workload you are giving to schools by throwing in a few more candidates who have not followed that school's unique programme of study! This will feel like a huge problem for the teacher to try and find a fair mini exam to give them which will reflect what they have studied. Teachers have full

timetables of other year groups who will also be desperate for attention and assessment feedback after lockdown.” (Teacher – responding in a personal capacity)

“Private candidates should have the option to sit their exams in summer 2021 to ensure fairness. Marking them along with students at school assumes private candidates have learnt the same specific topics and content as their school-attending counterparts which is certainly not the case for the majority of private candidates who learn different topics at different times.” (Student – private, home-educated of any age)

Comments from private, home-educated students echoed reservations about this option on the basis that they might not be able to find schools or colleges with whom they would be able to take the assessments.

Despite concerns about schools and colleges being able to take on and assess private candidates, many respondents considered this to be the most promising option available. Some made suggestions about how to support schools and colleges so that they would be able to accept these students.

“We have strongly agreed with proposals in Q54 because we believe this would be the best solution for private candidates and place them in a similar position to other candidates. It would be very helpful if DfE could facilitate this approach. Consideration should be given to funding centres to provide an additional service for private candidates, so they are treated in the same way as all other candidates.” (Awarding body or exam board)

“We agree that private candidates should be subject to the same arrangements as students in schools. It would make sense for exam boards to mark private candidates' assessments to reduce the burden on schools and also for private candidates to receive support from schools if appropriate. We do not support running normal exams for private students - this could be seen as a different system for private candidates and could become a divisive issue.” (Other representative or interest group)

“We believe the interests of private candidates would be best served by encouraging the broadest possible range of centres to accept private candidates and offer them the opportunity to sit the AO-set paper alongside their own candidates, either in centre or under remote supervision. We commit to ... working with centres to support them in doing so and would urge DfE and Ofqual

to consider what encouragement they might also offer to centres.” (Awarding body or exam board)

Some respondents suggested that private tutors should be able to assist schools and colleges, as they would be able to provide assessment evidence for their students or support any assessments that needed to be carried out.

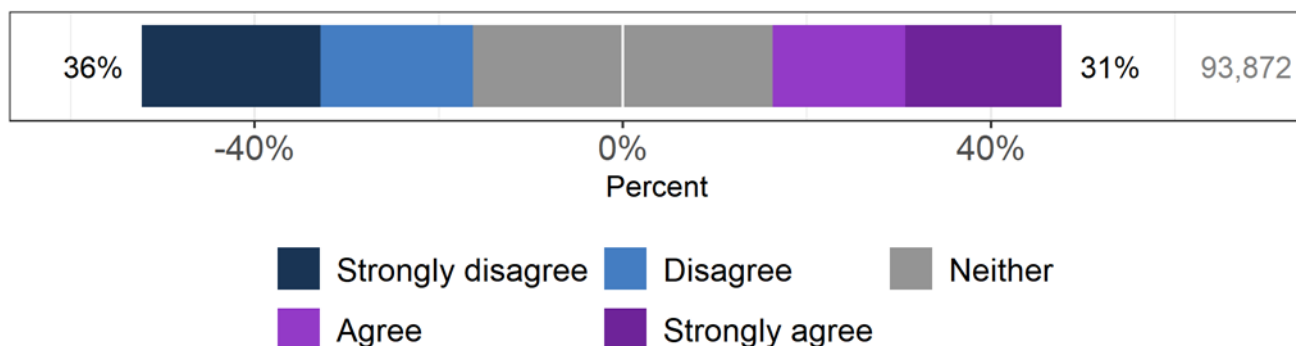
“Professional tutors across the UK are ready and willing to assist the Department to administer a fair solution for private candidates. The costs could be fixed by agreement with the DfE and the whole process centrally managed by [us], enabling a consistently high standard of evidence to be provided in an accountable manner whilst not adding any workload to schools and colleges. Through the use of online assessments and tutors specifically trained and randomly selected from a pool, private candidates could be assessed fairly and without risk of Covid-19 transmission.” (Other representative or interest group)

“Allow private tutors to work with exam centres. Private candidates who have qualified private tutors should be allowed to work with exam centres to give private candidates a grade as they know the level their students are working at.” (Student – private, home-educated of any age)

“Would you consider input from qualified private tutors on grades, previous work, mock exams etc. Would you consider assisting with finding independent centres for the exams to take place? Given that schools and colleges are overwhelmed at the moment, there may well be more resistance to accepting private candidates. As we don’t want to disadvantage private candidates (for a second year) a way needs to be found to facilitate taking exams.” (Teacher – responding in a personal capacity)

Q55. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?

Figure 50: Q55 - overall responses



Q55 responses	Count	Percentage
Strongly agree	15,962	17%
Agree	13,543	14%
Neither agree nor disagree	30,577	33%
Disagree	15,529	17%
Strongly disagree	18,261	19%

Q55 total responses	93,872
No response	6,724
Survey total responses	100,596

More respondents (36%) either disagreed or strongly disagreed that exam boards should run normal exams for private candidates in summer 2021 (Option C), than agreed or strongly agreed (31%), while 33% neither agreed nor disagreed. All 4 exam boards who offer these qualifications strongly disagreed. Despite the overall level of disagreement with the proposal, the views of private, home-educated students were more balanced, with 50% who agreed and 41% who did not.

Those who disagreed or strongly disagreed were concerned that allowing private candidates to take exams when these had been cancelled for other students was unfair and created a two-tier system.

“We are aware that there are many learners and schools and colleges who would have preferred it if exams had not been cancelled. It would be iniquitous to make

the option of taking exams available to private candidates but to no one else ... From an operational perspective, the challenges associated with establishing a network of geographically spread examination venues in the time available are insurmountable within the constraints of exam boards' resources. From a public confidence perspective, it would not be possible to achieve parity of standards – real and perceived – between the two differing routes to the award of grades.” (Awarding body or exam board)

“Either you run exams or you don't. If my daughter found out that some people get to sit them but she is not allowed to she will be so angry. She wanted desperately to sit them.” (Parent or carer)

“There cannot be two different systems in place for awarding grades this summer. That would create great unfairness.” (Other representative or interest group)

Many responses emphasised that private candidates must be permitted to take exams in order to achieve a grade this summer and be able to progress to the next stages of their lives. Many were concerned that the alternative proposals (Options A and B) did not offer sufficient surety that they would be able secure grades, particularly in light of their experiences during 2020.

“I strongly agree with option C, I really need to be able to sit exams this summer so I can get my grades at the same time as all the other students and move on to uni this academic year. I'm a student from the 2019 cohort, I was supposed to take exams in 2020 but due to cancellation I couldn't and I also missed my uni offers for biomedical science from my first choice university. During that time I became very stressed trying to find a place to give me CAGs (but no place were able to); and this hopelessness led to a huge decline in my revision, and by the time autumn exams were confirmed I was too late to catch up. Since then I've been studying very hard and even after the exam were cancelled I didn't stop studying with the hope that a that private candidates might be able to get grades this academic year, I can't express how relieved I felt when I saw the option (C) for normal summer exams.” (Student – private, home-educated of any age)

“As a private candidate, I believe the best option is to run a normal exam series in the summer. I, including many others, have taken a gap year due to having received grades last year much below our potential; therefore, option d will only delay our futures even more. Option b proved to not work for the majority of private candidates last year, and in terms of option a; students would much prefer

option c because they have been preparing for normal exams and would be comfortable with that instead of mini exams which there is an incredible amount of uncertainty around.” (Student – private, home-educated of any age)

“There are a large number of students in my school who take usually GCE and GCSE exams in their home language, eg, GCSE Polish. Last year they all had to be withdrawn as we did not have teachers who could have given them a CAG. Most of them have tutors outside of school or prepare themselves for these language exams. This year, I think they should be allowed to sit exams in these language qualifications so that they do not miss out for two consecutive years.” (SLT - Senior leadership team)

Respondents expressed different views about allowing private candidates to take exams. Some considered that these students would be able to handle the full exams because they were unlikely to have experienced as much disruption as students in schools and colleges. However, a few respondents suggested that private candidates should be given advance notice of the topics that would be assessed in the examinations and have a similar grade distribution as students in 2020, as announced in December 2020.

“Summer examinations as normal would be best for private candidates as they have typically not had the same disruption as typical students this year. However if they feel this is unsafe then they should have the choice of following the same process as a regular student.” (Student)

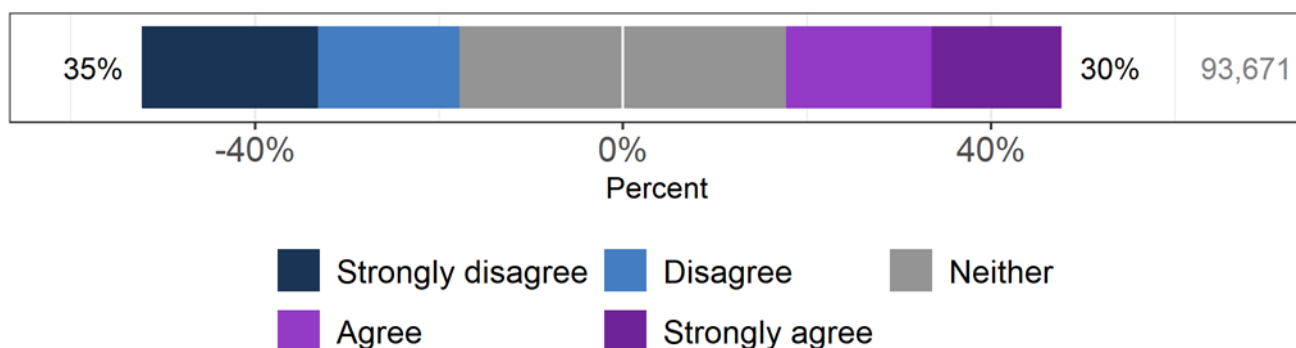
“Sit an exam under the same set of circumstances that was supposed to happen – ie, topics given beforehand, formula sheets provided. Allowance for lack of study having been possible due to lockdown and mental health.” (Parent or carer)

Others commented on how the option to take normal exams might advantage or disadvantage private candidates. Some suggested that the grades generated from exams would be more reliable and would have more credibility than teacher-assessed grades. Others were concerned that private candidates would face more rigorous testing across the full curriculum, unlike their counterparts in mainstream education, and more stringent marking. As a result, they might be disadvantaged when, for example, competing for university places with students who had received teacher grades.

“My main concern is that if some students take full exams and others are assessed by their teachers will all grades be treated as equally valid?” (Parent or carer)

Q56. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021?

Figure 51: Q56 - overall responses



Q56 responses	Count	Percentage
Strongly agree	13,264	14%
Agree	14,790	16%
Neither agree nor disagree	33,243	35%
Disagree	14,464	15%
Strongly disagree	17,910	19%

Q56 total responses	93,671
No response	6,925
Survey total responses	100,596

The same proportion of respondents (35%) either disagreed or strongly disagreed or neither agreed nor disagreed that exam boards should run normal exams for private candidates in autumn 2021 (Option D). Thirty per cent of respondents agreed or strongly agreed with the proposal.

In contrast to the previous 3 options (questions 53 to 55), the majority (61%) of private, home-educated students disagreed or strongly disagreed with the proposal, while 29% agreed or strongly agreed. Of the 4 exam boards who offer these qualifications, 3 also strongly disagreed with the proposal, while 1 agreed.

The concern expressed most frequently by respondents, whether they agreed or disagreed, was that private candidates must be able to obtain a grade this summer

and not be delayed by a further academic year. As a result, there was limited enthusiasm for an autumn series as the only option available for these students.

“Autumn exams are an absolutely terrible option and should not even be considered given how terrible they were last year. Students will miss offers and false promises of deferred offers is unfair. That will lead to students finally being able to go to Uni in 2022 while other students begin in 2021.” (Student – private, home-educated of any age)

“I very STRONGLY believe that exams should NOT run in autumn 2021 for private candidates. It would mean every private candidate having to take another gap year before uni, and a lot are already on their second one due to the circumstances last year. This would be an absolutely devastating decision if it were to go ahead.” (Student – private, home-educated of any age)

“This proposal carries all of the disadvantages [of summer exams], with the addition that the timing of the series would prevent (or severely impair) private candidates from accessing progression opportunities on a basis that was equitable to their main-schooled peers.” (Awarding body or exam board)

“While an autumn exam series would slightly lessen the damage if no workable solution for private candidates is available in the summer, the timing of the proposed autumn series does not support progression to college or university.” (Other representative or interest group)

“Option (d), autumn exams is not acceptable as a sole option, because it would further disadvantage these students by potentially delaying their progression to the next stage of their educational journey. It is also likely that only a limited number of students would take up the opportunity to sit exams in autumn, thus reducing the vital recognition and celebration of linguistic skills which qualifications in community and heritage languages provide.” (Other representative or interest group)

Q57. Do you have any comments on the options for how grades should be made available to private candidates?

We received 14,795 comments in response to this question.

In addition to the comments set out in questions 53 to 56 above, respondents said that there must be flexibility in the arrangements for private candidates in order to ensure they are able to obtain grades in the summer.

While most private, home-educated students had a preferred option, they also agreed with more than one and were concerned that not every option would work for everyone. Responses highlighted varied circumstances and different reasons why students elect to study outside of mainstream education. For example, those with medical conditions or special educational needs and disabilities that are better catered for through private and/or home-education, those continuing study beyond the age of 18 and balancing study with work and/or caring responsibilities, or those who take additional optional subjects such as community languages.

“There is no single approach that will work for all private candidates [...] Home education is very diverse, and this diversity is reflected in the wide variety of approaches used to prepare for exams [...]” (Other representative or interest group)

“Each student's situation needs to be assessed individually, instead of lumping large numbers of people together under broad headings. Disabled private candidates may be considered vulnerable (like myself) and may not feel safe to go out and sit exams in the middle of a pandemic ... This is the first year I am well enough to take my A levels and finally move onto university, I don't want to be held back yet another year because my needs are constantly being forgotten or dismissed.” (Student - private, home-educated of any age)

“There is a substantial risk that private candidates who also have additional educational needs would be substantially disadvantaged, especially if the only provision for private candidates is to force them to undertake an examination (unlike the rest of the cohort).” (Other representative or interest group)

“I believe that working alongside colleges could also be an option however many of us as private candidates are private due to other life commitments. For example, the reason I did not go to college is because with work and my child I could not commit to the schedule that local colleges have and therefore I believe

that although working with local schools and colleges to obtain our grades is doable it would have to be very planned and organised to not cause disruptions at either end and cost effective.” (Student – private, home-educated of any age)

Many also commented on specific challenges in accessing the qualifications, including those that have been exacerbated due to the pandemic.

“I phoned 20 schools to enter my daughter, I couldn't find a school willing to let her sit due to her special needs detailed in her EHCP. In the end it involved a 6 hour round journey. It's not fair. No school is interested because of the risk of Covid.” (Parent or carer)

“For the exams to continue for Private Candidates, this would involve going into a school in the middle of a pandemic. For shielding families this might not be an option and if the only alternative was option B, which would require a large amount of expense, many children will again be left without a grade, that they need to progress to Higher/Further Education.” (Student - private, home-educated of any age)

“Most private students have registered with private centres and have paid heavy fees for the same so they can get grades like all other students. It would be unfair to make them sit for full exam when exams have been cancelled for all other students. The stress and trauma of the pandemic has been the same for private students as the rest of the students in Year 13 so to expect them to sit normal exams is unfair. Exams should be given as an option but not made mandatory for all as it would be unfair.” (Parent or carer)

Some respondents commented on the basis of a misconception that “private candidates” referred to students in private or independent schools and were concerned that a different system was being proposed that would disadvantage students in mainstream schools.

Q58. If the preferred option for private candidates is an exam series, should any other students be permitted to enter to also sit an exam?

We received 22,160 comments in response to this question.

The most common suggestion from respondents was that all students should be given the choice of whether to sit exams or to have a teacher- or centre-assessed grade.

“I have read that students from disadvantaged backgrounds and boys in general are more likely to achieve higher grades in exams than their coursework predicted they would achieve. My son has ADHD and his GCSE results were, on average, 2 grades higher than his predicted results. He worked hard to understand and revise what he had struggled with in a classroom setting. For this reason, I think college-based students should be given the opportunity to take exams rather than being assessed by their teachers if they so wish. It also eliminates any unintentional bias teachers may have for/against students.”
(Parent or carer)

“Yes, because talking to many students they lament the fact they are not being given the opportunity to prove their learning. They have not been considered in all of the knee jerk decisions that have been taken. We are taking away their future credibility for their learning.” (Examiner)

“If private candidates are allowed to sit exams but candidates from normal schools aren't, I'll leave my school and become a private candidate in order to sit these exams. This is how strongly I feel about this issue.” (Student)

“Yes I think that A level students should especially be given this opportunity. I have spoken to lots of students over the past few weeks whether it be at my school or through my tutoring and the general consensus is that they want to do an exam series marked by the exam board. It is the fairest way for everybody.”
(Teacher – responding in a personal capacity)

Many respondents commented on the potential benefits of an autumn series, suggesting that any students who are unhappy with their teacher-assessed grade, should have the opportunity to improve their grade by taking an exam.

“There should be the same option as in 2020 where a candidate may have a 'free resit' in autumn 2021, with the higher of the two grades standing without being classed as a resit.” (Parent or carer)

“Students who are not happy with their awarded grades should be given the opportunity to resit in the autumn (or summer if they know their grade before it is sent to the board). This would reduce the pressure on schools should students not be happy with their outcome.” (SLT – Senior leadership team)

Others said that any exam series should only be made available for students who had been unable to access grades in any other way. They said that private candidates should have priority, and should not have their health or their opportunity to take an assessment put at risk by increased entry numbers, should the exams be available to all students.

“No. The system would become unworkable. We cannot manage candidates being assessed by teachers and/or taking an examination. The logistics could be horrendous, there could be the risk of COVID transmission and the decisions about which result has precedence would be messy.” (Academy chain)

“No as this would then open the flood gates to a possible high number when we do not know if sitting exams onsite will even be possible and last minute arrangements would not allow time for those with access arrangements to be properly considered.” (Exams officer or manager)

“If a private candidate is sitting an exam in a school setting then there should be no one else apart from the invigilator in the room unless there is written permission from the parent or carer of the candidate. Many home-educated students suffer from high levels of anxiety and mental health issues so this needs to be taken into consideration.” (Teacher – responding in a personal capacity)

A few said that, in exceptional cases, other students who had been unable to access a teacher-assessed grade could take an exam; for example, students who were unwell or who had specific access requirements and had missed the scheduled assessment window.

“There may be other limited circumstances when this might be an appropriate opportunity, for example where students in a school or college may have been disproportionately affected by illnesses affecting their teaching staff, and the provider has been unable to provide suitable alternative provisions ... where

experienced members of a team are ill and the only remaining staff in a team, are newly qualified and do not have the necessary experience.” (Governor)

“EHCP kids, vulnerable kids should be put first, as per Covid legislation.” (Parent or carer)

“There is a potential to provide for, eg, students who have recently moved schools, estranged students or students in care where school provision has been even more erratic or unstable than for the majority of learners.” (University or higher education institution)

Many respondents said that the same arrangements must apply for all students, including private candidates; either everyone should take the exams, or no one should. Others commented firmly that all students should take exams, while others were equally firm that no students should be taking any exams.

“You can't have one subset of students sitting an exam and another set not, they all have to be treated the same or you will end up with inconsistency and perception of some grades obtained having more value, this could lead to an implication that grade X is better for some students than for others.” (Parent or carer)

“Yes. All. The school I work at is on track in EVERY subject. We are crying out to do exams!” (SLT – Senior leadership team)

“Could we consider that socially distanced exams is the only way forward - it may mean remote working for other year groups but I feel most schools could offer socially distanced exams - perhaps with special arrangements for anyone who is ill or self-isolating.” (Governor)

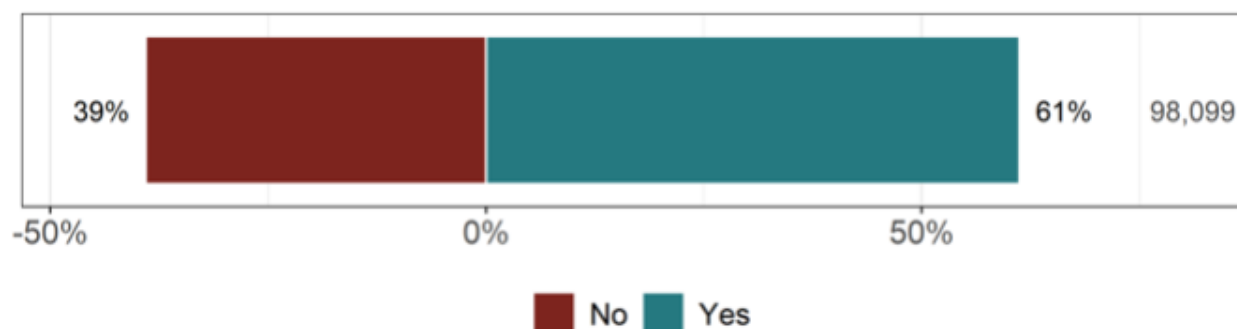
“Exams have been cancelled because of the risks and disruption caused by Covid-19. It would not be appropriate to offer the choice of sitting exams.” (Other representative or interest group)

“If an exam series is decided upon for private candidates, then I feel that this is unfairly targeting a proportion of students. To have one set of guidelines for one group of students, and another for independent students, is discriminating against the minority treating them unethically.” (Other)

Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world

Q59. Should the exam boards be prohibited from offering exams in any country in 2021?

Figure 52: Q59 - overall responses



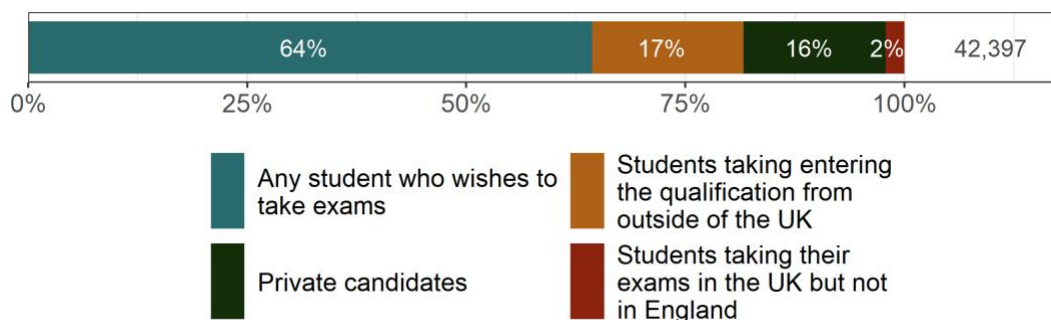
Q59 responses	Count	Percentage
Yes	59,896	61%
No	38,203	39%

Q59 total responses	98,099
No response	2,497
Survey total responses	100,596

The pattern of responses to this question was consistent across different respondent groups.

Q60. If you answered no to the question, should exam boards be prohibited from offering GCSE, AS and A levels in any country in 2021 – then which students should be allowed to enter for them?

Figure 53: Q60 - overall responses



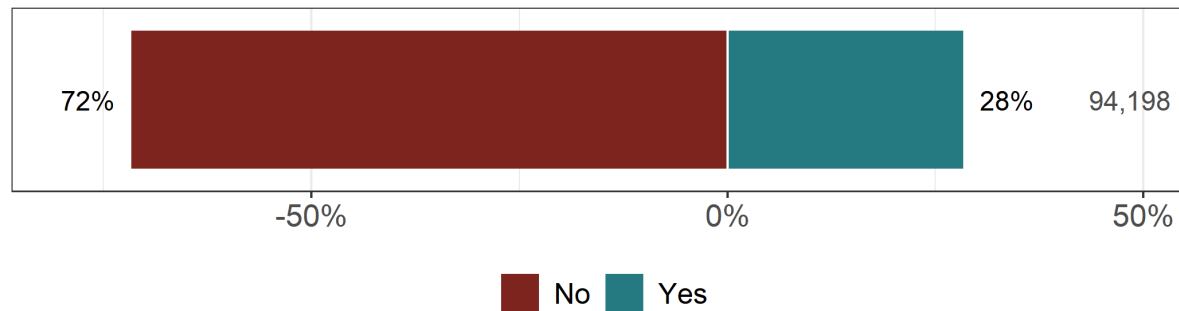
Q60 responses	Count	Percentage
Any student who wishes to take exams	27,284	64%
Students taking entering the qualification from outside of the UK	7,334	17%
Private candidates	6,884	16%
Students taking their exams in the UK but not in England	895	2%

Q60 total responses	42,397
<i>No response</i>	58,199
Survey total responses	100,596

Equality Impact Assessment

Q61. Do you believe the proposed arrangements (any or all) would have a positive impact on particular students because of their protected characteristics?

Figure 54: Q61 - overall responses



Q61 responses	Count	Percentage
No	67,517	72%
Yes	26,681	28%

Q61 total responses	94,198
No response	6,398
Survey total responses	100,596

Q62. If you have answered ‘yes’ please explain your reason for each proposed arrangement you have in mind.

We received 18,376 comments in response to this question. Many of the comments identified wider impacts that go beyond protected characteristics⁶.

A number of respondents highlighted that some of the proposed arrangements would be beneficial for students’ mental health and wellbeing.

“There will be considerably less mental stress and pressure on the students to perform as well as they would’ve done under normal circumstances. We have missed out on mounds of valuable school time and parts of the curriculum, which thoroughly affects the progress we have made and how (not) ready we are to take proper exams without the full knowledge of the curriculum.” (Student)

“I have a child with ASD, ADHD and anxiety. He struggled with remote learning in the first lockdown and is very behind. His relief when it was announced not having exams has significantly improved his anxiety.” (Parent or carer)

“Candidates with disabilities will be more able to be awarded a grade, as exams will be impractical and unsafe in 2021 - especially for those who require a separate room and any other requirements which put additional strain on a centre.” (Student - private, home-educated of any age)

“Online assessments, sat at home, could be better suited to some students with SEND [special educational needs and disabilities] or an illness, allowing them to better control their already familiar environment and negating the need to travel to a potentially unknown environment, likely with private candidates, which could cause additional stress or anxiety.” (Private training provider)

“Allowing time to appeal before universities are made aware of grades would reduce stress; allowing evidence from the whole time of study (not solely exams

⁶ The protected characteristics under the Equality Act 2010 are age, disability, gender reassignment, marriage and civil partnerships, pregnancy and maternity, race, religion or belief, sex, and sexual orientation.

brought closer) would reduce the burden on students who are already stressed and demotivated from online learning.” (Student)

“The bringing forward for results days will positively affect students as it will alleviate a small proportion of the stress they have endured this year, and last.” (Student)

A number of respondents suggested that the absence of exams this summer would be beneficial for students who experience exam pressure, or students who might otherwise struggle to demonstrate their knowledge, skills and understanding in exams.

“Using other evidence and previous class work may give a better understanding of someone’s academic level if they have extreme exam anxiety.” (Student)

“Some students find continuous assessment more suitable to their learning style. I think a higher proportion of students with protected characteristics will benefit from this approach.” (Parent or carer)

“Teacher assessments of students with specific learning difficulties will be able to draw on a wider range of evidence than an exam that might have been on a bad day, or might be able to decipher handwriting or dyslexic spelling in a way that an external examiner might not. They would then receive, I would hope, a grade closer to that which they actually deserve.” (Teacher - responding in a personal capacity)

“Students with EAL [English as an Additional Language] needs may find they do better because their teachers are used to their ways of working and will have a better understanding of what it is they were trying to say in their written work than an examiner.” (Teacher - responding in a personal capacity)

“I have autism and ADHD, and struggle to perform to my full potential in formal examinations. Not having formal assessments means that my grades can be fairly assessed by the teachers who know my abilities and limitations the best.” (Student)

A number of respondents identified that teacher assessment would have a positive impact as teachers understand their students and their circumstances and can make a holistic judgement of the standard at which they are performing.

“[Teachers] know what content students have covered, overall performance in lessons, and quite importantly learning and the impact of the pandemic and lockdowns, and can give a much more rounded and nuanced assessment than an exam (with no teacher input) could. Teachers know their students and their learning and abilities much better than any set of exams could, and are therefore in a much better position to decide, or at least guide, on students’ grades for this academic year.” (Student)

“Moving to teacher-only assessment and NOT using standard tests is the fairest way of ensuring a positive impact on students with protected characteristics. Teachers are best placed to understand how their learning has been affected and look at the overall trends in their academic performance including homework, etc.” (Parent or carer)

“The idea of teacher assessments using internally set mocks, coursework, and end of topic tests would provide a lot more parity for those living in disadvantaged areas who have great ability and have been unable to cover all the content.” (Student)

“I think that the proposed flexibility given in terms of evidence teachers can draw upon would protect the interests of students from less affluent circumstances who have struggled more in accessing education in the last year. For these students the best possible chance of a mark which reflects their ability will come from the opportunity for teachers to "cast the net wide" and create the strongest possible portfolio.” (University or higher education institution)

A number of respondents suggested that the proposed arrangements would address any potential subjectivity or bias in teacher assessments.

“Would remove some unconscious bias from teacher thinking (the use of specified assessment material).” (Teacher - responding in a personal capacity)

“If students are being assessed by mini exams, standardised by the exam board, this will remove the bias that teachers have on students with protected characteristics.” (Student - private, home-educated of any age)

“As different schools use different ways of assessing students it can be unfair to some students, hence I support exam board papers.” (Parent or carer)

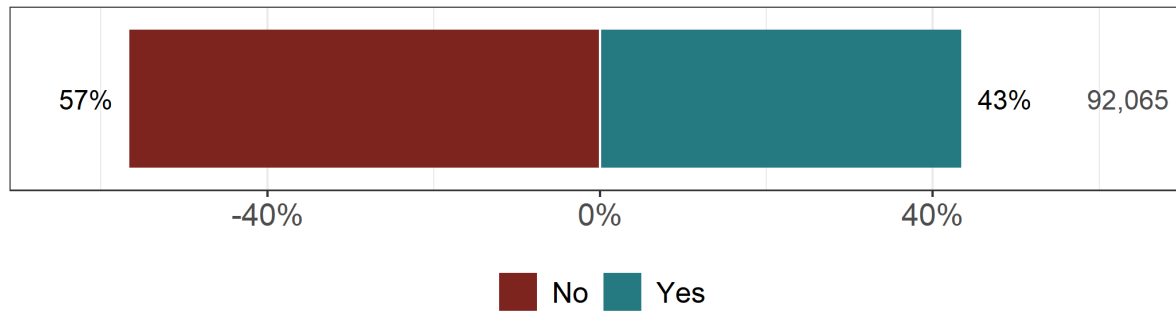
“I believe the appeals process and the moderation would ensure some disadvantaged students the option to ensure no bias had impacted their grade.” (Teacher - responding in a personal capacity)

“An effective 'appealing' strategy is a good idea to reduce teacher bias.” (Student)

A number of respondents stated that they did not understand the question, or the term “protected characteristics”. This was also seen in responses to question 64.

Q63. Do you believe the proposed arrangements (any or all) would have a negative impact on particular students because of their protected characteristics?

Figure 55: Q63 - overall responses



Q63 responses	Count	Percentage
No	52,112	57%
Yes	39,953	43%

Q63 total responses	92,065
No response	8,531
Survey total responses	100,596

Q64. If you have answered ‘yes’ please explain your reason and suggest how the negative impact could be removed or reduced for each proposed arrangement you have in mind.

We received 29,930 comments in response to this question. As with question 62, many of the comments identified wider impacts that go beyond protected characteristics.

A prevalent theme in responses was that students have experienced differential impacts to their learning during the pandemic, with some groups more likely to have experienced a negative impact. This was felt to be a particular concern in relation to the proposal that students could take exam board papers to inform teachers’ assessments of their performance.

“Exam board papers or any other form of mandatory assessments would disadvantage those who share a protected characteristic. Those with disabilities have been disproportionately affected by the pandemic. Mental health issues have been exacerbated and those with mobility problems have been particularly limited.” (Student)

“For candidates with learning difficulties, online learning has been an even steeper challenge, and the idea of sitting exam board papers seems obscene, individuals who usually need classroom assistance who have not been able to access it throughout lockdown will be at a massive disadvantage to how they would have been if they had been in education in person.” (Student)

“My son has ADHD and anxiety and should be supported through his EHCP at school, but throughout COVID this hasn’t occurred so his level of knowledge, work and achievement has fallen significantly as he is expected to self-teach via a PC with little or minimal SEN support compared to what he would have had in normal schooling. How can this make any exam-based assessment of him fair vs other pupils who are better able to self-teach and work independently?” (Parent or carer)

“We are a school with a resource base for hearing-impaired students. The students are engaged with their home learning lessons but find them more challenging because we are not able to use the same kinaesthetic learning opportunities that we usually provide in lessons, nor do we have the flexibility to provide as many interventions for the students (due to the lengthy screen time

this would require). Furthermore, due to safeguarding legislation (no 1 to 1 sessions online in Teams permitted) we are unable to check whether the student understands the language delivered when we are providing signed support for mainstream live lessons. This is without considering how tiring it is for students to keep up in mainstream school – not taking into account the additional demand on concentration and tiredness that screen time creates. I feel without considering these factors, Deaf pupils, and potentially other SEND pupils, are at a greater disadvantage due to the pandemic.” (School or college)

“Young people from less advantaged backgrounds have faced serious disruption to their learning and are less likely to have access to the resources they need to continue learning from home. This is compounding upon 8 months of disrupted learning in 2020, which was unequally felt by different groups.” (Other representative or interest group)

“Existing data gathered through the pandemic finds that children from disadvantaged households are less likely to have access to online face to face teaching, their own digital device and a quiet place to study. As a result, they tend to participate in fewer hours of remote learning compared to their more affluent peers. This means that they are likely to have suffered greater learning loss and could be at a further disadvantage when taking assessments or having enough work ready, to their usual standard, for teachers to review.” (Other representative or interest group)

“We are 92% BAME students in an inner city setting. Our students have been disproportionately impacted by the virus and impacted by a lack of IT facilities at home.” (School or college)

“Sexual orientation, gender reassignment: students are more likely to be unsafe at home which could affect the work they've done at home. Take into account work done throughout school/college not just final exams.” (Student)

“Students in abusive households for whom school was their outlet, and who wouldn't be able to work at home because of this.” (Student)

“Some female students have been tasked unfairly with duties in the house such as looking after siblings and taking on domestic tasks, this has had an effect on their studies and will ultimately affect them if exams take place.” (Student)

A number of respondents suggested that students’ mental health would be negatively impacted if they have to take papers provided by exam boards. This could be exacerbated if the format of the papers was unfamiliar. Some suggested this was a particular risk given that students had been adjusting to the cancellation of this summer’s exams.

“The effect of the pandemic on a student’s mental health has been devastating. Whilst assessment provides the fairest representation of a student’s ability, the pressure of sitting multiple assessments may be too much for students this year.” (Student)

“I think that providing ‘mini assessments’ will massively negatively impact our students’ mental health. The act of saying exams are over and then later replacing them with a much sooner, alien concept of smaller ones is stressing the students out so much.” (Teacher - responding in a personal capacity)

“Students with alternative learning needs and autism spectrum disorders will have heard that exams are cancelled. The proposals that exam boards write papers and potentially all students sit them at the same time is basically exams as they are usually sat. Students with ASD will not understand the difference (because there isn’t one) and this will cause significant distress and disengagement. You cannot state exams are cancelled and then run exams under another guise.” (Parent or carer)

“Having an unclear format can bring about a lot of anxiety and those with mental health conditions or learning difficulties will be further provoked by all the changes and the possibility of sitting exams after being clearly told they weren’t on the 6th January.” (Student)

“It would be better to do the proper exams if mini papers have to be used. SEN pupils will be significantly disadvantaged because we don’t even have them in school to prepare them. They cannot practise with their extra time, they cannot practise with a reading pen. All my ASD pupils are having to cope with change

and ambiguity. They are at a significant disadvantage.” (SLT - Senior leadership team)

“There are difficulties for all visually impaired students in drawing or adding to existing diagrams. These students have grown up learning specialist procedures in maths and science and geography and music. Changes in presentation of these assessments would be catastrophic to the reporting of their achievements.” (Other representative or interest group)

Some respondents suggested that the move to teacher assessment for this year’s awards would itself have a negative impact on students’ mental health.

“Anxiety-induced students will struggle profusely worrying that every piece of work they complete will go towards their grade. Depressed students may feel helpless and give up.” (Student)

“If schools carried on pushing students to the end of the year, and there were no exams, students would feel that every piece they submit up to the end of the year is essential, as they can now be assessed on it. This pressure wears away at their mental health.” (Student)

A recurring concern regarding teacher assessment was that teachers’ judgements might be affected by bias, which could result in a negative impact for particular students or student groups.

“I worry that BAME will be negatively affected due to prejudicial opinions and stereotyping.” (Student)

“PP [Pupil Premium], black and working class boys are much more likely to receive poor teacher assessments. Teacher assessment (and all the things related to it) harm those who do not stereotypically perform well in exams.” (Teacher - responding in a personal capacity)

“The teacher assessment could reflect poorly on neurodivergent (eg, autistic) students as they may be seen as poor students, not based on how capable they are but due to behaviour or working practices in class that are seen as outside of the norm.” (Student)

“Dyspraxic and dyslexic people often underestimated.” (Student)

“The whole point of cancelling exams as a whole is due to circumstances that meant different students had different time out of school due to Covid-19. When trying to take this into account, it will be tricky to not show bias in how much to take into account.” (Teacher - responding in a personal capacity)

Some respondents were concerned that students’ grades could be influenced by the type of centre they attend, or the historic performance of their centre.

“What if you have one incredibly dedicated and intelligent student in an under-performing school, their high grades could be taken as an anomaly and thus changed to better suit the pattern.” (Student - private, home-educated of any age)

“Those that attend private, independent schools and colleges may have an unfair advantage over those that don't, when centre-assessed grades are being calculated. I say this because on many occasions, teachers may feel a sense of obligation to fulfil their paying students' needs, eg, getting them their ideal university place and so will then award their students inflated/undeserved grades.” (Student)

“Private schools will [...] be unfairly advantaged - more well off families, smaller classes, schools pushing for/expecting higher grades.” (Teacher - responding in a personal capacity)

“If previous year(s) performance is used as part of the monitoring tool, this means schools that have a large proportion of students from a disadvantaged background will have their results based on what previous students have (or have not) achieved, rather than solely based on their own performance. Therefore it will not allow for growth of the school.” (Teacher - responding in a personal capacity)

“As usual grades will be believed in the high performing schools/colleges and disbelieved and moderated in the poorer equivalents.” (School or college)

A number of respondents were concerned that the proposed arrangements for teacher assessment would not allow some students to demonstrate their best performance, for example, through classwork and non-exam assessment.

“We are concerned that the proposed approach of grades being awarded on the basis of evidence of how learners are performing may disadvantage many learners who have been unable or have difficulty in accessing remote learning. There is likely to be insufficient evidence of the level of their performance from their interaction with teachers and many would have missed assessments that have taken place remotely.” (Other representative or interest group)

“Disabled/very ill students that may not have been able to complete the same volume of work as regular students with normal attendance in school will have a massive disadvantage since attendance and volume/breadth of work is being taken into considerations by schools/colleges and external examining bodies.” (Student)

“Students who have been shielding (such as myself who has not been in college since March 2020) have not had the opportunity to have as much learning with their teachers, and therefore it may be harder for teachers to make a judgement.” (Student)

“Those which have special needs or come from disadvantaged backgrounds which have made learning harder during this pandemic will need more flexibility in what teachers can use for assessment as there may be very little evidence from the last year.” (Teacher - responding in a personal capacity)

“Students who are school refusers are likely to have a lower grade through teacher assessment since teachers won't have the evidence.” (Exams officer or manager)

“Students from low-income backgrounds who are carers for younger siblings – work so far would not be an accurate representation of the grade they are worthy of/would achieve in final exams.” (Student)

“I think it is very hard for children and young people of traveller families to be assessed effectively by their teachers if they have attended a number of different schools or lost contact with school support during the pandemic.” (Parent or carer)

“If work is used from lockdowns people with poor mental health are at risk of not progressing with a grade they previously had the mental strength to work at.” (Student)

“If class participation has to also be considered, then that would have a negative impact on more anxious students.” (Student)

“AAs [access arrangements] are available in exams but not always practical in classroom assessments - how would grades be adjusted to reflect this & how would schools evidence it?” (Teacher - responding in a personal capacity)

Some respondents were concerned that students would not be able to demonstrate their best performance in exam board papers.

“There is concern about the ability of schools and colleges to manage the heavy staffing demands of SEND pupils' access arrangements whilst maintaining a COVID-19 secure environment. Placing readers or scribes in close proximity with a student for a prolonged period of time presents significant risks both to the candidate and to the adult providing support. Many SEND pupils experience health conditions increasing their vulnerability. The COVID-19 restrictions and associated disruptions have reduced opportunities for SEND pupils to practise using access arrangements designed to afford reasonable adjustment.” (School or college)

“If exam papers do go ahead outside of the school setting the risks are extremely high that SEND students will not get the support they need with scribes, etc.” (Teacher - responding in a personal capacity)

“Visually impaired candidates use different formats; these will be difficult to provide if schools are using a pick'n'mix style. Will exam boards provide the same set of MLP [modified large print] and Braille to allow for VI [visual impairment]

requirements? Will papers be provided in advance for early opening and individual modifications?" (Teacher - responding in a personal capacity)

"A Braille candidate CANNOT access an examination online." (Other representative or interest group)

"There is a high potential for "paper congestion" as papers are compressed into a short timescale. This would negatively impact students who need time to recover between assessments, e, children with cerebral palsy or processing Issues." (Parent or carer)

"Our students have extra time and if these mini exams went ahead within a compressed time frame this could be too much for them and mean they don't perform at their best." (School or college)

"The fasting month of Ramadan falls from 12 April until around 12-13 May. Students who are fasting will have an even greater burden this year." (Parent or carer)

Other respondents suggested that some students would only be able to demonstrate their best performance in the exams that were originally planned.

"For disabled students such as myself it is really difficult to work at a consistent level throughout the year, even without the disruption from the pandemic, but an exam can be worked towards over time at varying levels of work." (Student)

"Many male students do not work until the end of the year in year 11 and again at A level, meaning other assessment routes will weaken last minute uplift typically characterised in assessment data for particularly boys in socioeconomically disadvantaged areas." (Teacher - responding in a personal capacity)

A number of respondents raised concerns about the impact on students' progression.

"Concerns around the fairness of the proposed assessments and the impact on students from deprived backgrounds leads us to have concerns for our ability to recruit applicants from POLAR (participation of local areas) Q1 and Q2 as we

would want to (and in order to meet our OfS targets).” (University or higher education institution)

A number of respondents identified impacts relating to private candidates, which are included in the analysis of questions 53-57.

In terms of how negative impacts could be removed or reduced, a frequent theme in responses was that teachers should be trusted to determine students’ grades. A number of respondents suggested that teachers are well placed to understand their students’ performance and individual circumstances, with some suggesting that teachers should take students’ circumstances into account in making a holistic judgement.

“The circumstances are by nature unequal and unfair. Those closest to the experience of the individual students should be entrusted to award grades.” (Teacher - responding in a personal capacity)

“With internal assessments the teachers know the capabilities of their pupils and could take all factors into consideration.” (Parent or carer)

“Teachers [...] are aware of the extra complications in a student’s life outside of school and know what other things they are having to deal with on top of online school, missing school, as well as the toll of a global pandemic.” (Student)

“Allowing teachers to consider mocks, course work/non-examined assessments, homework questions, practice papers, how hard the student works, their attitude to learning, etc, will allow those students who struggle in exams to be fairly graded.” (Student)

“Assessment of individual students’ home circumstances and access to learning given during the year should be an incorporated part of teachers’ assessments (access to online learning/teaching, effective spaces and time within the home to allow study being some examples).” (Parent or carer)

“We have a high percentage of BAME students in an area where infection levels have been high. As a result, many of our students have been disproportionately impacted by isolation. There are students in Year 11 who have only spent around

2 weeks in school since September. Whilst the standard of the work produced now and in the summer obviously needs to form the basis for deciding grades, the fact that some students have already fallen behind needs to be taken into account.” (SLT - Senior leadership team)

“SEND students have particularly struggled during the pandemic, particularly those with EMH [emotional and mental health] issues. [...] Some way of teachers being able to draw on a wider range of evidence is important for these particular students.” (SLT - Senior leadership team)

“Final grades need to have SENCO or SEN lead involvement, or involvement from the person in school who coordinates, supports the student’s SEN information/interventions/EHCP etc if not the SENCO.” (Parent or carer)

“Schools seek specialist guidance from EAL professionals in the design of any internal assessments set, and in the overall judgement of an EAL learner’s performance over 2020/2021.” (Other representative or interest group)

“It is crucial that exam boards are not given roles that could dilute the professional judgements made by the teachers who know the children. This is particularly important for children with protected characteristics.” (School or college)

Some respondents suggested that students should be awarded grades based on their teacher’s assessment of what their performance might have been under normal circumstances, rather than their actual performance in the current circumstances.

“The use of a grade which reflects a student’s current, not projected, performance means that the impact of the pandemic is still very much in play. Students who have had the opportunity to attend school for longer and experienced less disruption will inevitably be outperforming those who have had to isolate and do not have the materials to access remote learning. Non-PP students and higher performing students will be advantaged. As part of the evidence base, teachers should be able to take disadvantage of this type into account and use their judgement to decide what could have been achieved had these issues not been in play. This is the only way to bring all students onto a level playing field.” (Teacher - responding in a personal capacity)

“The assessment should be weighted towards what they were capable of achieving had the pandemic not occurred, not how they are actually performing following months of disrupted learning, possibly with inadequate space to study, devices & internet connection. It is acknowledged that this is a difficult assessment for a school to make, but it is fairer than the proposals.” (Parent or carer)

“Students that are ill and whose conditions have worsened in the long term will be assessed on their current work which may be far below what they are capable of producing when they are well. If assessments are to be compulsory, they should receive special consideration like normal exams.” (Student)

“Teachers should award the grades that, based on their professional judgement, an SEN student could reasonably be believed to have been capable of achieving if FULLY supported and without disruption to their learning. Anything less than this would be unfair disadvantage.” (Teacher - responding in a personal capacity)

“All schools have grades prior to lockdown for all of their students and the trajectory that they were on. It would be easy to compare trajectories from previous cohorts and award them the grade that they would have achieved. Courses could be in place to support filling the gaps in their next academic establishment to ensure that they leave education having completed the required learning.” (School or college)

“It should take into account the improvement which one would make under the pressure of the real exam.” (Student)

Some respondents suggested that, as part of a holistic judgement, teachers might make a separate assessment of the extent of a student’s lost learning, in addition to an assessment of the student’s performance.

“We have proposed that there should be a system which allows for centres to take into account what they know about the differential impact on students when they grade individual students and to report this to the exam boards as part of their grade submission.” (Other representative or interest group)

“If [...] the grades themselves are unlikely to take into account differential learning loss across individuals or group characteristics, then it is vital that some sort of indicator is included to provide context for institutions making decisions on the basis of those grades. The detail and evidence used for this will need careful consideration, but would be an important step in ensuring the fairness of this year’s assessment in terms of the impact this will have on progression, which is a key outcome for this cohort. An indicator would also be beneficial to higher education providers when making admissions decisions, to allow them to more easily take into account the context in which a student achieved a grade.” (Other representative or interest group)

Some suggested that students should simply be awarded their predicted grades.

“A true reflection of students’ abilities would come from UCAS predicted grades as they were made when the pandemic and remote learning had a limited impact on students in comparison to now, when students are burnt out and suffering from mental health issues from remote learning as well as having to self isolate inconsistently across the country.” (Student)

“Predicted grades which have been submitted to UCAS should be used, as these are decided by teachers and would reflect accurately how well students would have done were it not for disruption caused by the pandemic.” (Other representative or interest group)

A number of respondents stressed that there should be arrangements in place to address any bias in teachers’ assessments.

“Teacher assessment could have unconscious bias against particular students. Anti-bias training could reduce this.” (Student)

“It would be best practice for equalities issues, including the equalities impact assessment written by Ofqual and DfE here, Ofqual’s literature review from last year and issues and research raised publicly by other groups, such as the Runnymede Trust, to be considered by all education staff and subject departments when deciding upon grade judgements. It would also be helpful for Ofqual and/or the boards to create joint guidance about unconscious bias and objectivity in grading in the way they did last year, but updated with respect to the process this year.” (Other representative or interest group)

“I think [...] that the grades decided for students should be closely monitored by multiple staff members, all of whom know the student’s ability, to ensure that there is no bias towards any student due to their protected characteristics.”
(Student)

“The student’s name should be withheld or a number assigned to ensure the paper is anonymised and marked by the teacher and an external examiner.”
(Parent or carer)

“Careful internal and external moderation and review of teachers’ actions including special attention given to students who may fall into minority groups from their ethnic/financial/disability, etc, background is needed to avoid discrimination.” (Student)

“Unconscious biases exist in all forms in most schools. There will be instances where students are not given the grade they deserve. Robust appeal process must be in place.” (Parent or carer)

“If students were allowed to appeal a grade and then have the evidence anonymously marked, with little to no personal information being told to the examiners, this can help reduce any form of discrimination faced by students.”
(Student)

Some suggested that a student’s grades should not be influenced by the historical performance of their school or college.

“Teachers should not have to mark students down based on past years’ pass rates. Whilst these should be taken into account, teachers should not go off how many A’s they got in 2019, etc, and only allow that percentage of this year’s class to be awarded an A. Evidence should be given and students should get the grade they deserve not based on past results.” (Student)

“Many students exceed their school’s trend in performance and tend to do much better. Grades should completely be based on teachers’ judgement and evidence of the students’ past work and performance in mocks and assessments.”
(Student)

A number of respondents suggested that exam board papers should not be used. Others suggested that it should be a student's choice whether they sit papers or not (although in these responses it was not always clear whether the papers would be the proposed exam board papers or the exams that had originally been planned).

"Students have experienced differing challenges depending on their various circumstances during this pandemic. Different students will have coped in different ways. It can't be a "one size fits all" approach as that is unjust. Allowing students the choice to opt in to an exam as well as having continuous assessment for those others seems the fairest way." (Parent or carer)

"I believe exams should be optional for students that WANT to do further exams. It should not be compulsory for students, as they may feel extremely overwhelmed and will severely impact their mental health." (Student)

"Perhaps consider allowing students who wish to appeal their final grade the opportunity to sit an examination, if they would like to and they think it would support them in achieving a higher grade. In any other circumstance, I do not think it would be fair to assess students, with them already having been told exams are not going ahead." (Teacher - responding in a personal capacity)

Some suggested that, as previously planned for the summer exam series, students should receive additional support materials for any papers that they sit.

"In the event that mini exams must go ahead, students should be told what is on the paper as that was the plan before exams were cancelled." (Student)

"Give notice of the topics in assessments or include formula sheets, help sheets, etc." (Student)

Some respondents stressed that disabled students should receive their required reasonable adjustments.

"It will be particularly important that full access arrangements are in place for any short exam papers, if learners are to be required by either awarding organisations or centres to take these. These arrangements must take into account the diverse environments in which different learners may be having to sit these exams." (Other representative or interest group)

“It is imperative that whatever evidence is used to determine a candidate’s grade is annotated as to what access arrangements (including modifications, etc) were in place. Further we would like it compulsory that a specialist teacher is consulted so can confirm/deny which arrangements were in place and whether this was what was needed.” (Other representative or interest group)

A number of respondents suggested that there should be a consistent approach for all students, with some suggesting that the exams that were originally planned should be reinstated.

“It is unfair to have some students assessed via different means. If exams are used, either all or no schools should be following the approach (this includes private candidates). Either possibility could favour one group of students, which is not a fair assessment.” (Student)

“If exams are sat by some students but not others, this is not equal. [...] All students should be assessed by the same range of criteria over the same time period.” (Parent or carer)

“The only way to alleviate the levels of injustice is to reinstate the exams.” (SLT - Senior leadership team)

“Using externally sat papers/summer exams means that everyone is answering the same questions, and therefore it is fair.” (Student - private, home-educated of any age)

“It is vital all students are treated equally - formal exams are the only way to do this.” (Parent or carer)

“Exams are the fairest approach, any other process, no matter how well thought out, is going to put students at a disadvantage as they cannot show what they are able to achieve in the exam situation.” (Exams officer or manager)

A number of respondents suggested that early clarity on this year’s arrangements would remove or reduce a negative impact.

“The children need a decision to be made as soon as possible. Mental health in our young is terrible at the moment and the uncertainty makes it worse for them.”
(Parent or carer)

Finally, a number of respondents suggested that there should be dedicated support for those students whose learning has been impacted during the pandemic.

“We note the Secretary of State’s commitment to create a new expert group to look at differential learning and monitor the variation in the impact of the pandemic on students across the country. But we are disappointed that this expert group has still not met, nor been able to feed into this consultation. The DfE needs to convene this group as a matter of urgency and ensure that it informs the approach teachers should take to exam papers and the national tutoring programme.” (Other representative or interest group)

“There is an important role for the DfE’s proposed expert group on learning loss to explore how the impact of lost learning can be mitigated, so that universities can identify where students might require additional support. This includes an assessment of how lost learning might disproportionately affect certain higher education applicant groups and where further contextual information could be helpful for universities.” (Other representative or interest group)

“Some form of support is essential to allow these students to consolidate their learning and reach their potential either by:

- 1) repeating a year at their school or college
- 2) taking an access course at an alternative institution
- 3) taking a foundation year at the university they hope to progress to

This could take the form of an Educational Maintenance Allowance or other means of supporting themselves for an additional year without income. It will be critical to ensure such support is clearly communicated alongside the announcement of grades.” (Other representative or interest group)

Regulatory Impact Assessment

Q.65 Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above? If yes, what are they?

We received 24,277 responses to this question.

We set out in the consultation our analysis of the burdens associated with proposed assessment arrangements. Respondents commented on the burdens we had identified and highlighted additional ones.

The proposed use of exam board papers attracted much comment, particularly about the potential negative impacts on the mental health and wellbeing of students, and the increased workload for teachers who would be expected to mark assessments that made use of such papers.

Many respondents said that teachers should be trusted to assess their students without the need for any external assessment to take place, and a range of proposals made for how this might be approached; others indicated they would prefer exams to take place as usual. The range of views from respondents about how to reduce burden and costs are set out in detail under question 68.

“Your proposal is the worst possible hybrid which appears to result in the exam boards being essentially paid handsomely for doing very little whereas teachers are going to be hit by an avalanche of work at a time where they are already under massive strain. The first impact will be the marking load created. They will then be asked to moderate this work first internally then externally. After this they will be faced by a mountain of appeals because parents will be all too aware after last year’s debacle that if they shout loud enough then changes will be made. The burden is unacceptable and will have as yet unforeseen consequences in terms of staff sickness and school parent relationships.” (Governor)

“The idea of a new set of exams, which are not exams, which schools mark for no money instead of examiners, which they are then held to account for, in a short window of time, with appeals being more widespread... yes, there are additional burdens [...]” (SLT – responding in a personal capacity)

Impacts on students’ mental health and wellbeing

Many respondents returned to concerns already raised and summarised earlier in this report about the potential negative impact on students’ mental health.

Workload of teachers, SLT and other school and college staff

Many respondents expressed strongly their concerns about the workload involved in delivering the proposed arrangements in schools and colleges. They emphasised the wider context in which this would take place. They highlighted the challenges of assessing students when teachers are already stretched and working at full capacity on delivering full teaching timetables to all year groups, currently remotely. It was noted that when back in the classroom, there will still be the burden of teaching within public health restrictions. Concerns were frequently raised about the extent to which teachers would be diverted from other teaching, and the negative impact this would likely have on students in other year groups, including those in years 10 and 12 who expect to take exams in 2022. The challenges both of assessing students and preparing for the next academic year with current Year 11 and 13 in school, instead of on study leave, was also raised by many. Marking external assessments and managing volumes of appeals were highlighted by many as the most burdensome aspects of the proposals for schools and colleges, teachers and SLT.

Many said they expected the additional workload would have a negative impact on teacher mental health and wellbeing, with the risk of teacher 'burnout'. They said that teachers will do whatever is required because they care about their students but that it is not fair to expect them to do what is not manageable. Some suggested in the longer term this may lead to teachers being absent with stress, and would also cause issues with teacher recruitment and retention.

"Teachers will need to continue delivering the course while putting in place all these additional measures and undergoing training. I am concerned this will be unmanageable for teachers and negatively impact their health. Additionally, this may mean that lessons are impacted and therefore students are not taught as effectively as they would have been were teachers under normal circumstance."
(SLT – senior leadership team)

"Additional pressure of exam marking whilst continuing to deliver a full timetable - as a teacher this would be a considerable additional workload burden at a time when workload is almost unmanageable in terms of planning and delivery of online learning." (Teacher – responding in a personal capacity)

"Burden of additional extensive marking within tight timescales to teachers still working with a full timetable, when usually this would fall to exam board markers who would be specifically paid for this task" (Teacher – responding in a personal capacity)

“There is an enormous burden being placed upon teachers in marking exam papers and awarding grades at the same time as they will be expected to still teach a full timetable” (SLT - Senior leadership team)

Some respondents commented that the proposed arrangements would place considerable additional burden on teachers, compared to those associated with a normal exam series, which is usually managed in schools and colleges by exams officers, with little to no direct involvement of teaching staff.

“Impact on schools and colleges - you note that the alternative arrangements would be delivered in place of the usual range of activity. However the usual activity is administrative and carried out by support staff, led by an Exams Officer, eg, secure handling of papers and scripts, invigilation. Cases of malpractice and maladministration are rare. The proposed alternative arrangements will place a high burden on different people - teachers and school leaders. So there is no offset from the usual activities not taking place. [...]” (SLT – Senior leadership team)

Respondents raised concerns about the time available to put the arrangements in place and deliver them. Many felt that the final plans should take into account school holidays, both in the lead up to assessments and when appeals might be made. Some highlighted that this would cause particular issues for schools that typically finish in early July, including independent schools and schools in certain local authorities.

“Timescale - carry on teaching, assess the pupils, give them the exams in whatever form. Then mark, moderate and then enter to boards. Then deal with external QA and then have to run an appeals process for the exam boards. This is going to be a significant challenge.” (School or college)

“This proposal may well impact on teachers’ summer holidays. This has been an extremely trying year for the profession and teachers’ holidays should be protected.” (Teacher – responding in a personal capacity)

Respondents identified that teachers would need time to familiarise themselves with guidance on assessing students, attend any training, then plan the delivery of the new arrangements, including selecting topics on which to assess their students or writing their own papers and mark schemes. Some suggested the need to redesign the curriculum. Many noted it would be difficult to release staff for the time required to undertake all of this activity.

Some suggested teachers would also need to prepare students for any new format of assessment once this was known.

The marking of exam board papers was highlighted as a particular concern and, as noted earlier in this report, one that examiners usually elect to do and for payment. Many respondents considered this would be extremely challenging or even unmanageable to do in addition to the further assessment based on other, internal evidence, and alongside teaching responsibilities.

“Teachers already have a vastly increased workload this year. It is not acceptable to burden them with the training and marking load proposed. Schools in general do not have the staff to deliver the exams adequately, on top of the existing requirements.” (Teacher – responding in a personal capacity)

“If exam boards issue papers for us by schools it is unfair to expect the additional burden of marking these papers to fall on teaching staff. This should be managed by exam board employees. I feel strongly about this and that it is adding too much additional workload to staff - when would they be expected to mark them if they are going to be teaching up until the end of the term?” (SLT – Senior leadership team)

Respondents told us that, setting aside the marking of exam board papers, assessing students based on other internal performance evidence would be very time consuming, as they would need to identify, gather and consider data and evidence to inform grades. Many respondents said that schools already have lots of data on students to inform their decisions – though some noted gaps due to disruption to teaching during the pandemic. Some concerns were raised about the burden of gathering physical evidence of student work, if this is required.

Some respondents highlighted the considerable time and burden involved in the CAG process in 2020. Some suggested a similar process could be easier to undertake with schools closed, due to available space, while others thought this could increase the challenge of accessing student work. Additional challenges and burdens were highlighted for heads of subjects with large cohorts, and for new, less experienced teachers. Respondents noted the potential complexity of drawing on evidence from both internal and external data to inform a final grade.

Some commented on the difficulty of reaching accurate decisions for students who fall at grade borderlines, and for this reason were concerned that departmental discussions would be very time consuming. Respondents highlighted the need for clear guidance on criteria for determining grades. Some suggested that schools and colleges may choose to introduce an additional step of moderation across their local

authority. There was reference to time needed for heads to check the grades and sign a declaration before submission.

“Time spent in school setting up the QA process, delivering the QA process, marking the exams, moderating the exams, compiling portfolios of evidence for exam boards to scrutinise, training from the exam board, administration around choosing papers and questions, uploading marks and grades, checking results are in line with previous years”. (Teacher – responding in a personal capacity)

“The sheer time it will take for staff to gather, moderate, standardise evidence coupled with the challenge of students who are being taught remotely making ongoing assessment even more challenging.” (SLT – responding in a personal capacity)

Many respondents highlighted the potential administrative burdens to schools and colleges if required to provide large volumes of evidence to exam boards as part of the external quality assurance arrangements.

Many respondents expressed concerns about the burden to schools of dealing with potentially very high volumes of appeals. They considered this could place significant workload pressures on staff, and senior leadership in particular, at the end of the year. They feared this would mean working into the summer holidays. Some respondents also highlighted that there could be challenges in recruiting competent and independent individuals to consider appeals.

Some teachers raised concerns about the responsibility for students’ grades falling on them. They indicated this puts them in a difficult position as both teacher and assessor, when they naturally want the best outcomes for their students. For this reason, there were suggestions for calling it a ‘centre’ rather than ‘teacher’ grade. Some identified that potential pressure from parents and students throughout the grading, results and appeals process could have an impact on the wellbeing of teachers. Concerns were also raised about potential legal challenges, and potential impacts on the relationship between schools and students and their families, as some experienced in 2020.

“The burden on schools and colleges dealing with appeals throughout the summer could be enormous unless the window is very clearly and briefly defined - many of those at the level dealing with appeals will have spent all of last summer preparing for school return and all of Christmas preparing for testing that never happened, and now Easter preparing for exam assessments. We have no idea whether the unis will keep to late August to confirm offers, or make them after an appeal window is closed.” (School or college)

“I think you are potentially under-estimating the emotional burden on teachers, heads of subject, SLT and ultimately heads of putting students' results and therefore life chances directly into their hands.” (Teacher – responding in a personal capacity)

“The appeals process is potentially hugely problematic. We got the tip of the iceberg last time. This time both parents and students will be prepared and ready for it! Mental health of teachers also needs to be borne in mind please. Teachers are already feeling huge pressure around these and getting pressure from parents and students already. If teachers are to be responsible for submitting grades again (rather than have exams) then this needs to be considered really carefully as the pressure could be unbearable for some.” (Teacher – responding in a personal capacity)

Respondents said there would likely be significant work involved in communicating revised arrangements to students and parents, as well as dealing with high volumes of queries, subject access requests, and complaints from students and their families.

Non-teaching staff and resources for delivery of the proposed arrangements

Exams officers suggested that they and administrative support staff in schools and colleges would likely face additional administrative burdens to deliver the revised arrangements, including familiarisation with requirements, planning and managing delivery, including printing, of any exam board papers, as well as supporting the teacher assessment process, and coordinating and submitting data to the exam boards.

Some respondents highlighted possible logistical challenges to the delivery of external assessments if the exam boards papers were taken under exam conditions. They highlighted that more space than usual would be needed to allow for distancing between candidates and for the provision of reasonable adjustments (e.g., use of a scribe). There were suggestions that other year groups may need to study at home to make space for assessments.

Some considered there could be challenges to recruit sufficient invigilators if these were required, as many are older and vulnerable so may be shielding. Some highlighted the logistical challenges of invigilating assessments remotely.

Concerns were raised about delivering formal assessments alongside Covid mass testing for all students, including those taking assessments, increasing pressures on

staff and space capacity. Some considered that it would be difficult to deliver exam board papers safely in the context of the pandemic.

Impacts on students, including private, home-educated students

A number of students commented in this section about travel arrangements, if they had to take assessments in their school or college, including for students who would be travelling from outside of the UK, with the challenges of travel restrictions and quarantine. Particular concerns about costs were raised by private candidates if they might have to travel some distance to a centre and pay additional fees to enter.

Impacts on higher education

The most frequently made comment in responses from higher education institutions and their representative organisations was that they expected to face burdens and to incur costs if release of results to students is decoupled from release of results to universities to enable them to confirm admissions decisions. These costs related to additional staff resource to manage high volumes of student queries during this period in which they awaited confirmation of a place. In addition, respondents said there would be staff and venue costs associated with an extended clearing period, and providing support, advice and guidance to students for a longer period than usual between confirming places and course start dates. They added that they considered the period of uncertainty could be stressful for students. Some also expressed concerns about the burden on schools and colleges to provide support to students during this time.

“The proposal to potentially decouple results to students from results to the HE sector would place burden on learners, who will likely experience heightened stress and anxiety should they fail to meet offer conditions especially. If the HE sector receives results later than students universities will be unable to formally confirm places - resulting in stress for learners, and an increased resource burden on universities to respond to queries, reassure learners and manage the confirmation process.” (University or higher education institution)

“From the point of view of higher education, the cost associated with these changes will be marginal operationally and will mainly be associated with the strain on human resources that will be required to support applicants over what is likely to be a difficult confirmation period. There will also be an additional strain on resources imposed by an earlier issue of results, which will create a much longer clearing period and also the necessity for supporting applicants during their

transition to university over a longer period than normal.” (University or higher education institution)

A concern was expressed that students who meet or exceed their required grades may seek places in higher tariff universities ahead of clearing, which they described as a form of ‘back door post qualifications admissions’ that would give some students advantages over others.

It was noted that the proposed broad scope for appeals and the decoupling proposal could result in higher volumes of students than usual appealing against their grades, potentially impacting on admissions decisions.

Most higher education institutions expressed a view that they should be given embargoed access to results before they are released to students, as usual.

Other potential burdens to higher education institutions identified included:

- Putting in place provision for students at the start of their course to address gaps in learning during the pandemic.
- The potential for grade inflation, and the challenge of developing strategies for offer making until likely grade distributions are known.
- Late confirmation of awarding arrangements and timescales meaning that universities cannot plan for delivery of their admissions arrangements, including resources. There was reference to impacts on various contracts, for example to source venues and equipment for clearing. Universities would welcome certainty as soon as possible and then no further changes.

Exam boards

Three of the 4 exam boards regulated by Ofqual to offer GCSE, AS and A level qualifications in England responded to this question.

One exam board commented that they expected the regulatory framework to be revised to enable delivery of arrangements for 2021 and that there would be a burden involved in familiarising with this and ensuring the organisation is operating in compliance with the new requirements. They indicated they wished to work with Ofqual to minimise any burdens that could distract from delivery of 2021 assessment and awarding. This exam board also said they expected that the proposals could result in greater grade inflation than 2020, which could create challenges for 2022 awarding.

Another exam board highlighted a range of potential additional activities and burdens:

- The development and provision of guidance to centres on appeals processes – leading to increased support calls from centres

- Development of technology systems to deliver the new arrangements and to support student appeals to exam boards if the route to appeals is not via the centre
- Provision of data to Ofqual, development of reports, with data gathered from different systems, including newly developed technology
- Support to ensure private candidates can access grades
- Additional risk identification, analysis and management activity required to consider the final proposals and identify the associated risks (with appropriate mitigations) in what is likely to be a short time frame. Including risks relating to compliance with the regulatory framework.

The same exam board also raised concerns about managing potentially high volumes of appeals, expecting they will need additional staff for this.

“Allowing candidates and parents to appeal directly, without barrier or cost, will lead to a significant increase in appeal applications and appeal investigations [...]” (Awarding body or exam board)

The third exam board that responded to this question also commented on appeals, indicating that, based on their experience of 2020, they expected to require additional resource to manage complaints and appeals.

“Our experience of the volume of summer 2020 appeals, complaints and bias and discrimination malpractice indicates that we will need additional resourcing at middle and senior management level to manage these processes for summer 2021. Our current view is that the proposals will lead to a significant increase in these volumes, which are already very high.” (Awarding body or exam board)

The same exam board also highlighted challenges in the provision of modified assessments for disabled students.

“Based on the current timeline there is not enough time for exam boards to create modified variants of “standardised assessments” such as enlarged, Braille and accessible PDFs. The logical conclusion is that centres would be asked to do this, which would put a potentially significant burden on them at an already busy time.” (Awarding body or exam board)

Q66.What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting?

We received 17,638 responses to this question.

Costs to centres

Time cost

Many respondents expected there would be significant demands on staff time that would require them to work outside of their contracted hours including during their holidays. Some added that these demands would divert staff from other activities, describing this as an 'opportunity cost'. Details of the expected workload are reported in the responses to Q.65.

"No additional monetary costs but potentially large additional time costs."
(Teacher – responding in a personal capacity)

"These are time costs - there is no financial cost to the school, just to teacher workload, mental health and the profession." (Teacher – responding in a personal capacity)

"Significant demand on staff time including potentially working beyond contracted hours/weeks." (School or college)

"Substantial staff opportunity cost as the college would have to redeploy staff to assessment focuses [...]" (School or college)

Staffing costs

A number of respondents commented on potential additional staffing costs they expected schools and colleges may incur in order to deliver the proposed arrangements. Some provided estimates ranging from £10,000 to £200,000. Respondents told us that staffing costs could include:

- supply teacher costs to provide cover while permanent teaching staff undertake training and the range of additional work highlighted in responses to question 65. Some indicated a typical daily rate of around £150 - £250 per supply teacher

- additional/overtime pay for teachers, for marking exam board papers, and more generally, for the full range of additional work involved in delivery of the proposed arrangements
- recruitment of consultants/ external experts where needed to support the school's assessment and internal quality assurance processes
- invigilator costs – if needed for externally set assessments
- additional exam officer and administrative staff costs to support the revised assessment and appeal arrangements, and also volumes of correspondence, subject access requests and complaints from students and parents. Overtime pay for these staff to work outside contracted hours, including into the holidays
- recruitment of competent, independent persons to consider appeals
- any additional staff costs associated with assessing the work of private candidates - if this is required

Possible reputational costs to schools and school leadership were also highlighted, should high volumes of students challenge their grades through appeals and complaints.

Facilities, administrative and other costs

Other expected or potential costs to centres reported by respondents included:

- facilities/venues hire for delivery of any external assessments. Respondents said that additional space may be required to allow for sufficient distancing between candidates. They also highlighted that the requirement for schools to deliver mass Covid testing to all students would put greater pressure on space available
- provision of personal protective equipment (PPE), cleaning of assessment venues, resources (staff and space) to conduct Covid testing of students ahead of assessments
- provision of reasonable adjustments for disabled students – e.g. scribes, assistive technology, additional space
- administrative costs of copying/printing exam board set papers, (if the papers are used, and if exam boards do not provide hard copies)
- postage of student evidence to exam boards, if this is required for external quality assurance
- legal costs to deal with challenges from students who are unhappy with their grades

- delivery of any remote assessments - delivering papers to student homes (if the assessments are in paper form); costs of remote invigilation – through software or in person
- exam board training – with many saying this should be free
- supporting private candidates – either through assessing work to give a teacher grade or administering usual exams for these students only, if that is the decided approach

Exam entry fees

Many respondents argued that exam board entry fees should be reduced for 2021 as exam boards will be doing less and schools and colleges more work. Some added that they could not meaningfully suggest what their net costs might be until assessment arrangements and exam board fees are confirmed.

“It is impossible to comment with any certainty on the additional costs which will be faced by schools and colleges as a result of these proposals until significant decisions are made and details formulated. However, [our] members have raised significant concerns regarding the fees charged for entries. There is a strong feeling amongst our members that they did not receive value for money for the fees paid in 2020, despite the refunds from awarding organisations. Although we understand that exam boards will have some costs associated with the processes for awarding this year, our members believe that the fees this year should be significantly lower, particularly as the proposals in this consultation place the majority of responsibility for awarding grades onto centres. Our members are also clear that they should not have to commit large amounts of school funding to paying fees and be credited a percentage in retrospect, when there are far more pressing priorities for that money at the current time to support young people academically and pastorally throughout the pandemic.” (Other representative or interest group)

Costs to students

Many students indicated that they did not expect to incur any monetary costs as a result of the proposed arrangements. More comments were made about students' mental health if they had to take any form of external assessment and the risks of Covid transmission.

Some students and their parents and carers suggested they would incur costs from:

- working with tutors to catch up with lost learning
- new revision resources

- resources such as stationery, equipment for creative/technical subjects and IT/broadband to facilitate learning, and potentially taking assessments, at home. Also increases in families' energy and broadband bills
- potential lost income to families while parents and carers support their children's learning and invigilate assessments at home, and take students to exam centres if this is required
- fees for appeals against grades awarded, and taking exams at a later date (many indicating there should be no costs for these)
- costs of lost further and higher education places, scholarships and apprenticeships if students do not receive required grades
- costs of gap years if required to wait until 2022 to gain a university place
- longer term impacts on earning potential if progression is delayed, if students progress but with lower grades than expected, and if 2021 grades are not valued by employers in the same way as those achieved in other years

Respondents also raised concerns about the knock-on impacts and longer-term costs of the proposed arrangements to students in other year groups, including those in years 10 and 12 who are due to sit exams in 2022.

Private Candidates

Private candidates, including home-educated students, commented on potential costs to them and their families of the different options on which we consulted. The expected or potential costs reported in response to this question mostly ranged from around £200 to £1000 per subject, and included:

- entry costs (through whichever approach is decided on), including any late entry fees if deadlines are not extended beyond the date on which arrangements for private candidates are confirmed
- fees to centres to sit exams in their usual form if this is an option
- fees charged by centres to work with them in order to assess their work. A few also referred to costs for private tutors if needed to assess work.

Some respondents indicated they had already paid money to centres and were concerned that they may not receive refunds if they needed to move to other centres once arrangements are confirmed.

"I'd have to pay a school to sit the exams around £250. Unless the government can help pay for us private candidates." (Student - private, home-educated of any age)

“If there is no option for private candidates to be assessed through solely examination, it would create extreme inequality, as any alternative arrangements unless regulated to cost the same as sitting an exam series would be too expensive for a majority of candidates to pay, therefore meaning they would lose the opportunity to receive grades for this academic year, further hindering their progress. Personally, I was previously expecting to pay around £300 to take A Level exams. If I have to now receive CAGs and am unable to take an exam I will most likely be paying well over £1000 at a minimum [...]” (Student - private, home-educated of any age)

“Exam centre fees. Many exam centres are charging disgustingly high amounts with centres charging £1000 per subject for external candidates to get TAGs as they are aware exams were cancelled [...]” (Student - private, home-educated of any age)

“An exam as a external candidates is very expensive and places are raising prices as most aren’t expecting external candidates! In my area of 6 possible options 5 said no and one quoted £850 for ONE exam [...]” (Student - private, home-educated of any age)

Respondents also highlighted potential costs to private candidates of travelling to exam centres and overnight accommodation if they are not able to work with local centres. For those travelling from outside the UK, it was noted these costs would be higher, and respondents also expected to incur costs associated with Covid tests and a period of quarantine on arrival in the UK.

“If it’s not normal exams which are my only options with my centre as they’re rejecting me with TAGs or CAGs then I will have to travel to another city which I don’t have the money to afford.” (Student - private, home-educated of any age)

“Additional costs for private candidates living abroad and travelling to the UK for exams would include the costs of COVID tests, as well as potentially the costs of having to pay for accommodation for 10 days prior to the commencements of their exams, should a 10-day quarantine be required for people entering the UK from abroad at the time of the examinations.” (Parent or carer)

Cost to Examiners

Teachers and examiners who are usually employed by exam boards to mark exams said that they would lose out on this income for a second year. Respondents

indicated this income was typically around £1,000 - £2,000 per exam series. Some examiners explained that they are not eligible for furlough due to the nature of their contract. Many respondents commented that teachers should receive the equivalent pay that examiners would usually receive if expected to mark papers. Some also proposed that examiners/senior examiners should be employed to support assessment and quality assurance of grades. These themes are covered in question 68.

Costs to higher education

Higher education institutions commented that they expected to incur costs if release of results to students is decoupled from release of results to them in order to confirm admissions decisions. These costs related to additional staff resource to manage high volumes of student queries. In addition, they said there would be staff and venue costs associated with an extended clearing period, and providing support, advice and guidance to students for a longer period than usual between confirming places and course start dates.

Respondents also expected there would be costs to universities to put in place provision for new students at the start of their course to address gaps in learning during the pandemic.

Respondents also highlighted the significant costs to higher education of managing late changes to awarding in summer 2020, highlighting the importance of early confirmation of arrangements and not later changing these.

Costs to exam boards

All 4 exam boards regulated by Ofqual to deliver GCSE, AS and A level qualifications in England responded to this question. All 4 said that they expected to incur costs associated with the following activities:

- development of new assessment content, if this is required, or creating banks of questions for use by centres. It was noted that there would be costs even where papers or questions draw on existing or past papers. One noted they would write off any costs relating to the production and print of content intended to be delivered in summer 2021, where not possible to reuse this content
- external quality assurance of grades, which will be a new and different process from that followed in a usual year. One commented on the need to appoint additional staff for this
- managing potentially high volumes of appeals, setting up new systems and processes to support this, and appointing and training additional, specialist staff to investigate

- systems/process development and implementation for submission and certification of the teacher grades; setting up question banks if required; processing appeals direct from students if required, including, for example, facility to conduct identity checks, given that exam boards do not usually deal with students directly

Three exam boards said they expected to incur significant additional costs associated with producing guidance materials, training and supporting centres on determining and quality assuring students' grades, to achieve consistency and accuracy.

Two exam boards highlighted potential additional costs associated with the delivery of an autumn series for low numbers of private candidates, if that was required.

One exam board also indicated the following may lead to additional costs:

- costs of marking external assessments and non-exam assessment (subject to final decisions)
- earlier results meaning a shorter timeline to award grades impacting on all business activities

Q67.What costs would you save?

There were 13,703 responses to this question.

Savings to centres

Many respondents said that they did not expect schools and colleges to achieve any savings in the proposed arrangements for assessing students – that they could only foresee additional costs. Many repeated the expectation that exam boards would reduce their fees.

Some respondents indicated there may be savings if invigilators are not required for delivery of external assessments. If they are required, it was noted that there would likely be fewer invigilators and fewer overall hours worked than in a usual exam series.

“Invigilator costs for a centre delivering GCE and GCSE exams over a summer series would be approximately £15-25,000 depending on the number of candidates/access arrangements candidates/rooms used, invigilator hourly rate, etc.” (Other representative or interest group)

Respondents highlighted other potential savings:

- no moderation of non-exam assessments by exam boards – saving the costs that would usually be incurred in postage or making arrangements for visiting moderators
- facilities costs – potential savings on exam venue hire, heating, lighting that would be incurred in a usual series
- resources used for any practical assessments if these are not completed (e.g. chemicals for science or accompanists for music)

Savings to students

Many respondents indicated that they did not expect students to make any monetary savings as a result of the proposed arrangements. Many references were made to benefits to students' mental health from the cancellation of exams.

Some respondents indicated where there may make monetary savings **if** they are not required to sit external assessments – as follows:

- payments for tutors.
- exam revision guides and materials.
- travelling to centres – including private candidates, and students from outside the UK, who may also incur costs related to quarantine and Covid testing

- local bus and train fares, lunch at school or college and other similar costs associated with attending usual place of study (likely reflecting savings largely relating to school closures rather than assessment arrangements)

Respondents noted that there would be significant savings in the provision of technical and other resources to students if no remote assessments take place.

A number of respondents indicated there would be a health saving, relating to Covid transmission, to both students and staff in schools and colleges if students do not attend external assessments.

Savings to exam boards

All 4 exam boards offering GCSEs, AS and A level qualifications responded to this question. All indicated they expected cost savings as a result of not marking exams in summer 2021 – including examiner training and the scanning/processing and marking of exam scripts.

Two highlighted savings from not moderating non exam assessment.

Two exam boards said that if any external papers are delivered digitally they expected to make savings relating to print production and distribution of papers. One included the production of modified papers in this saving. One noted that even if not delivered digitally, there would still be savings given the papers would likely be on a smaller scale than in a usual exam series.

Two exam boards noted that if the final arrangements resulted in a net saving to their organisation, rebates would be made to centres.

“The ultimate impact of all cost savings is that, assuming the value of the cost savings outweighs the additional costs required to implement the proposed arrangements, this will result in a rebate to customers in the same method as was taken for 2020.” (Awarding body or exam board)

Q68. We would welcome your views on how we could reduce burden and costs while achieving the same aims.

We received 13,243 responses to this question.

Many respondents emphasised that the priority should be on fairness and integrity of the process for assessing and awarding grades to students rather than achieving any cost savings. Many also said that the mental health and wellbeing of students should be a main factor in any decisions.

Respondents also urged that we confirm arrangements as soon as possible and then make no further changes.

Do not require the use of exam board papers

A number of respondents repeated their opposition to the use of exam board papers in favour of reliance on student work from across the course, indicating that such an approach would be both fairer and less costly. They argued for flexibility in the approach that could be used.

Some teachers proposed that if an additional test is required, they be allowed to use past papers or develop their own. Some added that burden could also be reduced by exam boards taking a light touch approach to external quality assurance, such as a dialogue with schools and colleges, or sharing of information electronically. A few expressed views that exam boards should focus on quality assurance rather than production of new papers.

“Not implement the change! If we set the assessments ourselves there will be very little impact on our budgets.” (SLT – Senior leadership team)

“Reduce burden...scrap exams and the costs associated with them. Your teachers already have a wealth of data about their children.” (Teacher – responding in a personal capacity)

“Trust the teachers to assess and trust in their professionalism. Let us assess the students using past papers as we always do”. (Teacher – responding in a personal capacity)

“I feel very strongly that the teachers are currently in the best position to grade my child, they should be concentrating on teaching our children not these alternatives. If the predicted grade system was good enough last year, it should be appropriate this year also.” (Parent or carer)

“[...] The proposed mini exam system should be scrapped in favour of centre-assessed grades, evidenced heavily by in school work and mock examinations.”
(Student)

“As a general comment, the proposals offered by the consultation are over ambitious and over-engineered given the timescale before us. Further, schools and colleges are handling uncertainty and new demands on their approaches to teaching in centres and remotely on a daily basis. A process using as much similarity to the one used in 2020, though not technically desirable, would be a more defensible and easier for centres to understand and administer in summer 2021. Improvements could be made however at relatively low cost through the addition of the exemplification of expected standards of performance, quality assurance guidance, support to designated Lead Assessors who could be the locus of support and access to reference tests and data.” (Other representative or interest group)

“[...]The decision to assess students on the grade they are performing at creates the new issues that impact on time and cost this year. If better-moderated CAGs were introduced, this would be manageable and schools could have their summer terms back.” (SLT – Senior leadership team)

Reinstate the exam series

While this was not an option on which we sought views in our consultation, some respondents, mainly schools and colleges, teachers and senior leaders said their preference would be for the summer exam series to be reinstated. They indicated that this would be the least burdensome and costly approach for schools and would also be fairest for students. Some made suggested running a reduced series, assessing limited content across a reduced number of papers, with advance notice of topics as had been planned before exams were cancelled. Some also urged that we consider delivering exams online.

“Please do not cancel well established exams for something that has not been tried and tested and will lead to chaos and insecurity for students. Please do ask exam boards to modify the usual exams in a way that will not disadvantage students and use the usual trained exam markers to determine grades.” (Teacher – responding in a personal capacity)

“Students should be allowed to sit exams if they want to. Exam boards should judge student performance, not teachers or schools. This is the fairest way to award grades. Teachers and centres are subjective in their judgements, exam boards assess more objectively.” (Teacher – responding in a personal)

“Exam boards should set streamlined exams online for all pupils. Examiners mark, as usual. Ensures consistency and avoids huge additional workload.” (Teacher – responding in a personal capacity)

“I think you are overly complicating this - either take full control and have normal exams or leave schools to do CAGs. These proposals are potentially just exams by another name.” (SLT – Senior leadership team)

Reduce the burdens of external assessment (if exam boards provide these)

Respondents expressed views about how any burdens and costs associated with the proposals for the use of exam board papers could be reduced.

Schools and colleges, teachers and senior leaders argued that exam boards should mark papers, not teachers, both to reduce the burden on teachers and to improve the consistency of marking. They also said this would be more efficient.

Some respondents indicated they would welcome an independent, examiner-marked assessment to feed into their overall teacher assessment, provided that teachers do not have the burden of marking.

“Have exams marked externally. This will reduce the burden on schools and will enable a fairer awarding of marks and grades.” (Teacher- responding in a personal capacity)

“Work to ensure exam boards take on the burden of issuing papers and marking and moderating them, teachers provide an internal grade. This is entered to generate an overall mark. Weighted appropriately.” (SLT – Senior leadership team)

“Have exam boards mark the papers. Teachers could then build a portfolio of evidence confident in the same degree of rigour being applied across classes and schools - producing a more consistent outcome with the burden being acceptable.” (Teacher- responding in a personal capacity)

A few added that there may be potential to explore wholly automated marking for some assessments.

Some respondents felt strongly that if teachers are required to mark, then they must be paid as examiners are paid, and also that they should also be given sufficient time in which to mark. They indicated it should also be made as easy as possible to limit burden, e.g., short answer or multiple-choice questions, and a clear, unambiguous mark scheme provided. It was suggested that centres should aim to 'blind mark'. A few respondents considered that teachers should have a choice in whether or not they take on this task, and not be required to do it. Many said that exam boards should not moderate this marking.

"Pay teachers for each exam paper marked as examiners have been paid in previous years." (Teacher – responding in a personal capacity)

Many respondents said that burden and costs would be reduced if the exam boards delivered hard copies of papers to centres and did not require schools and colleges to print these.

Respondents asked that they be provided with options/notice of topics to enable them to prepare their students. Also, that the level of demand be equivalent across papers in a subject.

Some expressed views that exam board papers must be optional if used at all, to allow centres some flexibility to decide how best they can manage their workload.

"Teachers are experts at judging students' performance, they need to be able to award the grade that they feel is the likely outcome for students. Support from the exam board is welcome as are new assessment materials but any enforced assessment regime will undoubtedly lead to additional expense and difficulties as well as notional unfairness nationally." (Teacher – responding in a personal capacity)

A few respondents suggested that burden could be reduced by not imposing a 'one size fits all' approach, and instead considering different approaches for different subjects and different qualifications – for example, providing external assessment in maths and English at GCSE only, or for A levels only.

There were mixed responses to this question about costs and burdens in relation to the conditions in which any assessments are taken. Some respondents said that online assessments should be offered, with exam boards providing remote invigilation. Some parents and carers of private candidates indicated that exams taken at home would be less costly to them.

Give teachers time to do what is required

A number of respondents urged that teachers are given time to assess their students. There were many suggestions for giving teachers ‘non-contact’ time, including through additional inset days, reducing teaching timetables and marking expectations for other year groups and extending the May half term. Many teachers said that Y11 and Y13 students should leave school at the usual study leave time - to free up teachers to assess/make decisions on grades, and also to provide ‘gained time’ which teachers use to plan for the next academic year. It was suggested that government should provide guidance on how teachers might mitigate the additional burdens.

“Give clear guidance to teachers on ways that they can reduce workload and burdens to accommodate the additional workload created by the teacher assessed grading process this year. This should go beyond vague recommendations and aim to protect teachers from unfair and unnecessary workload that may be placed upon their shoulders. Ensure that all communications are given to schools with plenty of time to implement them fully.”
(Teacher – responding in a personal capacity)

“[...] The department could issue guidance or set expectations about teachers not having to perform administrative or ancillary tasks not related to the core mission of securing students their grades. There needs to be recognition that teachers don’t have infinite capacity, and that there has to be give elsewhere to enable them to perform these tasks.” (Other representative or interest group)

Exam boards to provide guidance, training and support to centres

Respondents commented on the guidance schools and colleges would need from exam boards in order to deliver the revised arrangements. Many were keen that exam boards did not overburden schools and colleges with lengthy, complex rules and guidance – rather, that they provide helpful guidelines on the evidence needed to support grades, and protocols for quality assuring grades. Many felt that it could be kept to a minimum as teachers know how to assess students. They proposed that training be delivered remotely and take place once only to cover arrangements for all exam boards. Some said there should be no costs for exam board training. Respondents said they would need access to an exam board help desk.

Respondents requested that they be given guidance and training and a clear timeline, as soon as possible to enable planning. They said that processes for submitting grades to exam boards should be simple and easy, allowing a realistic

time window to submit. Some emphasised that consistency in approach between exam boards would minimise burdens on centres.

Guidance for students, parents and carers

Schools and colleges highlighted that their burden would be reduced if the government or Ofqual could publish clear communications and guidance for students and parents on the arrangements for assessment, awarding and appeals.

Focus on teaching rather than assessment

Some students, parents and carers and teachers urged that the arrangements should support a focus on teaching for the remainder of the academic year. Some felt there was a risk of over assessing students if there were to be a limited window from which to collect performance evidence, and that students could be focusing only on preparing for assessments in their short time back in school or college once they reopen. Some were keen that students complete the syllabus as far as possible, to minimise the gaps in their knowledge and skills and best prepare them for their further study or employment.

Minimise costs to private candidates

Many private candidates and their parents or carers set out how costs to them could be reduced. Some proposed that exam board fees be reduced or waived for private candidates. Some proposed that government subsidise, standardise or cap the fees centres charge to assess their work. Many were keen that the system is as easy as possible for private candidates, and that they should be supported in finding centres to work with. A few proposed that evidence and assessment by private tutors be used. A number considered that all the options on which we consulted should be available enabling candidates to choose. If exams take place, respondents felt that these should be local and accessible to students, or that they should be permitted to sit them at home.

Minimise burden and cost to centres of appeals and legal challenge

Many school and college respondents would prefer exam boards to manage appeals, to reduce costs and burdens, removing or at least reducing the need for teachers, senior leaders and administrative staff to work in the summer holidays. Some said that burden would be reduced by limiting the scope of appeals so that students could not bring a substantive challenge against teacher grades. Many urged that the government protect schools and colleges from complaints and legal challenges in relation to grades awarded. Some asked that they be called centre-

assessed grades rather than ‘teacher assessed’ so that the centre overall is accountable, not the individual teacher.

Fees for appeals and exams at a later date

Many students argued that they should not be required to pay any fees in order to appeal. Many also considered there should be an opportunity for all students to take an exam at a later date free of charge if unhappy with their grades.

Additional funding for schools and colleges for the additional workload

A number of respondents asked that government provide additional funding to schools and colleges to enable them to pay teachers for the additional work, and to employ supply teachers while permanent staff assess/grade students. Some respondents specifically referenced that general annual grants (GAG) for academies should be increased.

“Ultimately, schools and colleges cannot be expected to bear the additional burdens or costs associated with the exceptional arrangements for the awarding of qualifications this summer. Government must recognise that these unique arrangements bring increased and unexpected costs to centres and it is government who must provide the funding required to implement them.” (Other representative or interest group)

Employing others to support the process

A number of respondents suggested that individuals other than those working in centres be employed, paid or unpaid, to support the grading and quality assurance processes – including examiners, retired teachers, invigilators and any furloughed staff.

Progression to higher education

Many universities and higher education institutions urged that results to students are not decoupled from university admissions as proposed, but that instead, universities receive embargoed results before they are released to students, in the usual way. Some added that they would prefer results to be issued in August as many of their staff take leave in July, and also to be aligned with results for other qualifications. They emphasised that early clarity would support their planning. It was also suggested that planning to support students catch up would be helped if all schools and colleges took a consistent approach to content coverage for the remainder of the academic year.

In contrast, some students felt that early release of results would reduce their stress and help them to plan their options.

A few respondents expressed concerns about the potential for different approaches to assessment in other qualifications such as international GCSEs, the Pre U and the International Baccalaureate, when these students compete for the same HE places as A level students.

Students repeating the academic year

Some respondents, including parents and carers, proposed that students should repeat the entire academic year due to having missed so much learning. There were also suggestions that students could take a foundation year before progressing to higher education so they are better prepared.

Funding to students and teachers for remote teaching and learning and assessment

Respondents proposed there should be funding to students, including grants and bursaries, for learning resources, IT and broadband provision and also to cover the increase costs arising from studying at home (e.g., energy costs). Some said that similarly, teachers should receive funding for teaching from home.

Exam board costs and burdens

Three exam boards offering GCSEs, AS and A level qualifications responded to this question.

One exam board indicated that early clarity and use of past papers would reduce burdens.

“Provide clarity as soon as possible for exam boards, centres and students. Allow exam boards to provide past papers rather than new assessment material (and limit the number as far as possible whilst providing sufficient coverage to take account of lost teaching and learning.)” (Awarding body or exam board)

Another exam board said that consistency with VTQ processes would be helpful

“Aligning processes as closely as possible with those for applicable VQs would strip out complexity and streamline costs.” (Awarding body or exam board)

The third exam board provided a detailed response highlighting the risks and challenges of delivery of a teacher assessment approach for qualifications that are usually assessed by examination, and the importance of support to centres. They added that the cost burden would be minimised if arrangements were as consistent as possible with those that would normally take place.



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Published by:

ofqual

Earlsdon Park
53-55 Butts Road
Coventry
CV1 3BH

0300 303 3344

public.enquiries@ofqual.gov.uk

www.gov.uk/ofqual