

Final Report

Consultation on arrangements for an autumn 2021 exam series

Analysis of responses

Prepared for

ofqual

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Glossary

Acronyms	Definition
A	Advanced
AA	Achievement Assistant
AEA	Advanced Extension Award
AS	Advanced Subsidiary
BAME	Black Asian and Minority Ethnic
CAG	Centre Assessment Grade
D&T	Design & Technology
EPQ	Extended Project Qualification
FSMQ	Free Standing Maths Qualification
GCSE	General Certificate of Secondary Education
IGCSE	International General Certificate of Secondary Education
MFL	Modern Foreign Languages
NEA	Non-Exam Assessment
NTP	National Tutoring Programme
OFQUAL	Office of Qualifications and Examinations Regulation
SEN	Special Educational Needs
SEND	Special Educational Needs and Disability
TA	Teacher Assessment
TAG	Teacher Assessed Grade
Y12	Year 12

Introduction

Background and objectives

Due to the COVID-19 pandemic, GCSE, AS, A level, and the Advanced Extension award 2021 summer exams were cancelled. Along with the cancellation of summer exams, the government announced that students would be assigned teacher assessed grades in the summer and that an autumn exams series would run in autumn 2021.

The Office of Qualifications and Examinations Regulation (Ofqual) conducted a consultation on arrangements for autumn 2021 exams to seek views on how the exam series should take place in autumn. The consultation aimed to collect the public's opinions, in particular the opinions of relevant stakeholders (e.g. students, teachers, and exam boards), on Ofqual's proposals on the eligibility, form, and timing of the exams, appeals and certificates, regulatory requirements, and the potential impacts of autumn exams.¹

Responses to the consultation will help identify the best way the 2021 autumn exam series should run to provide students with the opportunity to improve their teacher assessed grades (or be assessed if they could not receive a summer grade).

[The consultation](#) was available online for 24 days and received 1053 responses. The consultation gathered views on the following proposals:

- any student who receives a teacher assessed grade in summer 2021 should be able to enter the autumn exams
- any student who an exam board is satisfied would have taken exams in summer 2021 had they not been cancelled, but who did not receive a teacher assessed grade, should be able to enter the autumn exams
- grades should be determined by a student's performance in the exams alone; non-exam assessments should not be taken into account (with the exception of art and design qualifications)
- art and design qualifications, for which there are not normally any exams, should be assessed through students completing an exam board's set task only
- the exams should be in their usual form and in their usual number for each subject
- A level exams (and any AS exams) should be held in October and GCSE exams in November and December
- students will be able to use the better of the summer or autumn grade
- exam boards will replace certificates showing only summer 2021 grades with certificates showing autumn grades if a student requests this
- normal reviews of marking and appeal arrangements will apply
- the exam boards should be required to offer exams in all GCSE and A level subjects unless there are no entries for that subject by the time of the closing date. Ofqual invited views on whether it should require or permit the exam boards to offer AS exams, or prohibit them from doing so
- no new requirements will be placed on the exam boards that offer Project qualifications or the Advanced Extension Award in respect of making awards in the autumn

¹ International GCSE exams, although mentioned by some respondents, are not regulated by Ofqual and are out of the scope of the consultation.

Approach to analysis

The consultation was available to be completed through an online form from 17 March 2021 until 9 April 2021. The consultation included 35 questions covering the proposals for the arrangements of the autumn exams. The questions were: (i) quantitative, having a format of a 5-point scale (Strongly Agree, Agree, Neither agree nor disagree, Disagree, Strongly disagree) or two-option questions (Yes/No, Permit/Require), and (ii) qualitative, open-ended questions where respondents could provide comments on the proposals.

Respondents selected the respondent type category they belonged to.² For the main analysis of the responses to the quantitative questions, we grouped the original respondent types into seven categories:

- Education or training providers (including academy chains, private training providers, schools, or colleges)
- School and college staff (including teachers, SLT members, exams officers, or managers)
- Exam boards or awarding organisations
- Parents or carers
- Students
- Students (private, home-educated of any age)
- Other (including consultants, local authorities, other representative or interest groups, governors, examiners, universities, or Higher Education Institutions, other)

Throughout the analysis presented in this report, the answers to quantitative questions are summarised into bar charts, presenting frequencies of responses broken down by respondent groups as listed above. The Appendix section includes analytical tables of the responses to the quantitative questions broken down by original respondent type.

All responses to the qualitative questions were read in full. For these questions, we presented the key themes which emerged from respondents' answers. We also added comments from respondents, which were slightly edited to correct typographic errors and to keep respondents' identities anonymous.

Respondents could submit their final response without having replied to all questions. Many respondents skipped the qualitative questions or replied with "I don't know" or "No comment". These answers were not included in the total number of responses presented in the document.

Summaries of the views of three representative or interest groups are included in the analysis. Responses to the consultation were not submitted through the online form but summarised in a document submitted to Ofqual. Therefore, their responses are not captured in the quantitative questions, but they are reflected in the qualitative ones.

The report is organised into the following sections: (i) Eligibility to enter exams; (ii) How students should be assessed; (iii) Grades for practical skills and spoken language; (iv) The form of the exams; (v) When the exams should be held; (vi) Reviews of marking and appeals; (vii) Certificates; (viii) Regulatory requirements; (ix) AEA and Project qualifications; (x) Equality impact assessment; (xi)

² The respondent types included: (i) Academy chain, (ii) Governor, (iii) Private training provider, (iv) School or college, (v) Senior Leadership Team, (vi) Teacher, (vii) University or Higher Education Institution, (viii) Student, (ix) Student – private, home-educated of any age, (x) Awarding body or exam board, (xi) Exams officer or manager, (xii) Examiner, (xiii) Parent or carer, (xiv) Consultant, (xv) Local authority, (xvi) Other, (xvii) Other representative or interest group.

Regulatory impact assessment.

The questions are presented in the same order as in the consultation document.

The profile of respondents

In the following tables, we present the number of respondents by respondent type and by geographic location.

Table 1. Number of respondents by respondent type

Respondent type	Number of respondents
Education or training provider	67
School and college staff	456
Exam board or awarding organisation	5
Parent or carer	179
Student	189
Student (private, home-educated of any age)	102
Other	55
Total number of respondents	1,053

Table 2. Number of respondents by geographic location

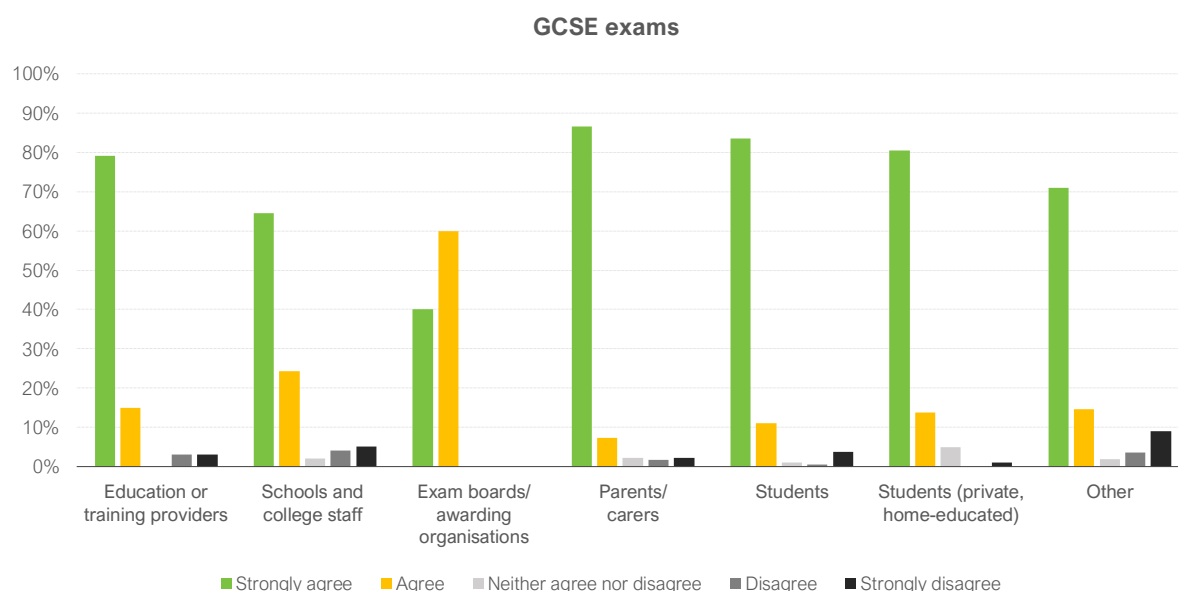
Geographical location	Number of respondents
England	1,037
Wales	3
Northern Ireland	3
Other EU country	5
Other non-EU country	5
Total number of respondents	1,053

Eligibility to enter exams

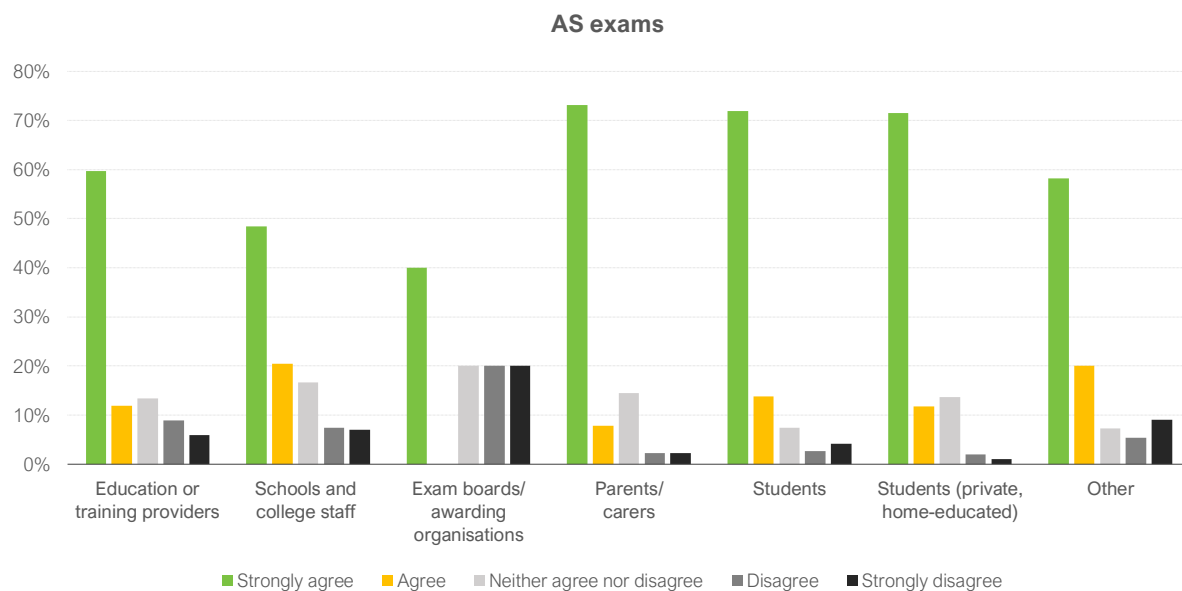
QUESTIONS COVERED IN THIS SECTION The first section of the consultation focused on the proposal that students who want to improve their teacher assessed grades can participate in the autumn exams. Ofqual proposes that students who have received a teacher assessed grade and students who would have entered the summer 2021 exams had they not been cancelled should be eligible for the autumn 2021 exams. The questions in this section explored respondents' views on who should be eligible to enter the autumn exams, including (i) students who received a teacher assessed grade in summer 2021, (ii) students who would have entered the summer exams based on the exam boards' opinion, irrespective of whether they received a teacher assessed grade or not, and (iii) all students.

This section covers questions 1 to 4 in the consultation.

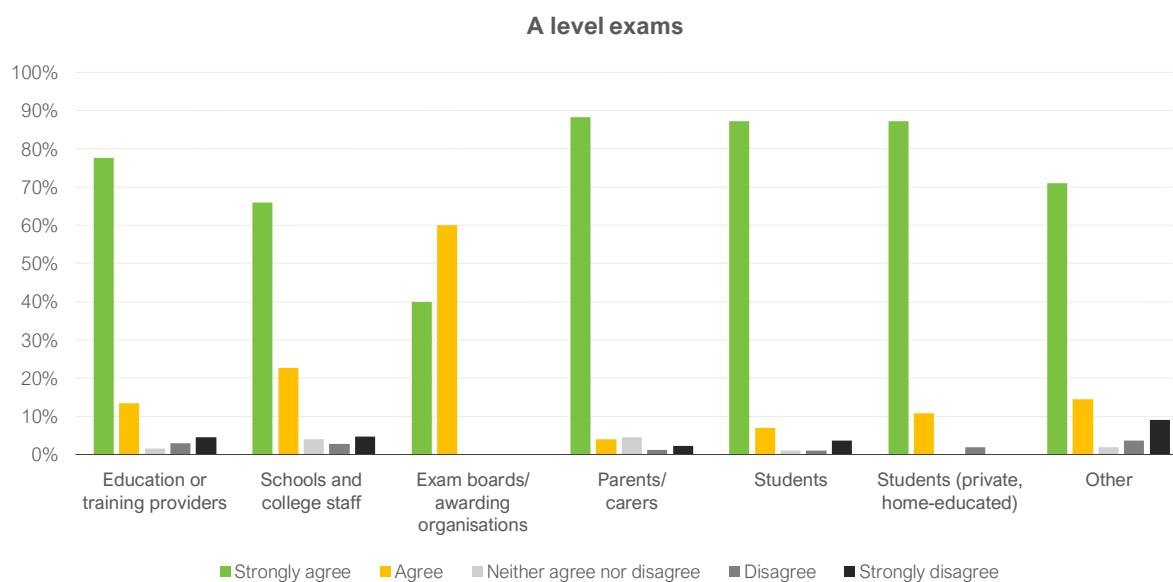
Q1. To what extent do you agree or disagree that students who receive a teacher assessed grade in summer 2021 should be eligible to enter the corresponding: GCSE exams in autumn 2021; AS exams in autumn 2021; A level exams in autumn 2021?



Most respondents agreed with the proposal that students who received a teacher assessed grade in summer 2021 should be eligible to enter the GCSE exams. Many respondents strongly agreed with this proposal, including education or training providers (79%), schools and college staff (64%), parents and carers (87%), students (84%), private and home-educated students (80%), and other respondents (71%). The exam boards and awarding organisations were also in favour of this proposal – 60% agreed that students who received a teacher assessed grade should be eligible to sit the GCSE autumn exams. None of the exam boards and awarding organisations were against this proposal.

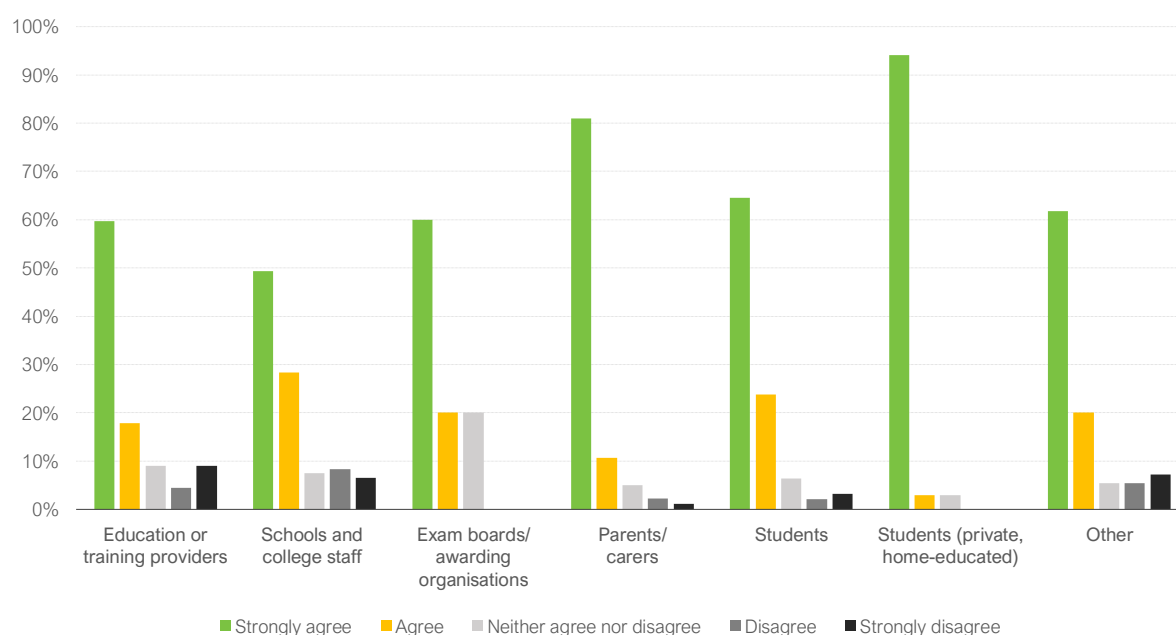


A high percentage of respondents strongly supported the proposal that students who received a teacher assessed grade in summer 2021 should be eligible to enter the AS autumn exams. Parents and carers (73%), students (72%) as well as private and home-educated students (72%) strongly agreed with this proposal. Regarding the other respondent groups, 60% of education or training providers, 48% of schools and colleges staff, and 58% of other respondents also strongly agreed with the proposal. Among the exam boards and award organisations, responses were split equally between those who agreed with the proposal and those who disagreed (or strongly disagreed) (40%) with the proposal.



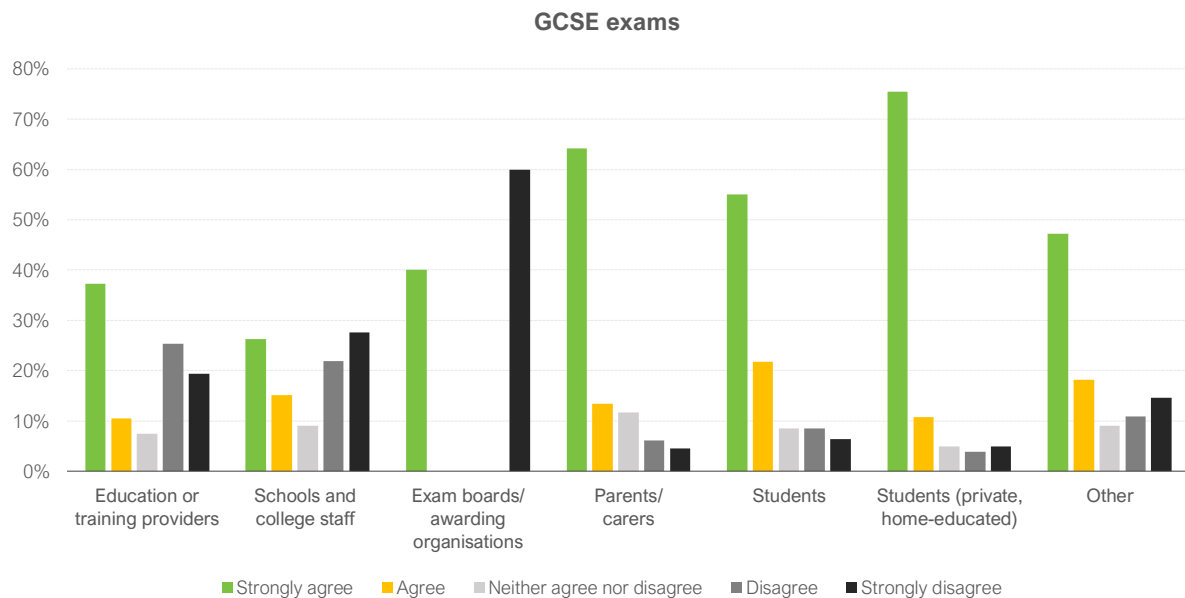
Many respondents strongly supported the proposal that students who received a teacher assessed grade in summer 2021 should be eligible to enter the A level exams in autumn 2021. Parents and carers (88%), students (87%), and private and home-educated students (87%) strongly agreed with the proposal. The majority of education or training providers (78%), schools and college staff (66%) as well as other respondents (71%) also strongly supported this proposal. The exam boards and awarding organisations were also in favour of students with a teacher assessed grade received in summer 2021 being eligible for the A level autumn exams – 60% of this group agreed that students who received a teacher assessed grade should be eligible to sit the A level autumn exams. None of the exam boards and awarding organisations were against this proposal.

Q2. To what extent do you agree or disagree that exam boards should be able to accept entries for the autumn exams from students who did not enter to receive a grade in summer 2021 but who, in the opinion of the exam board, would have entered for the summer 2021 exams had they taken place?

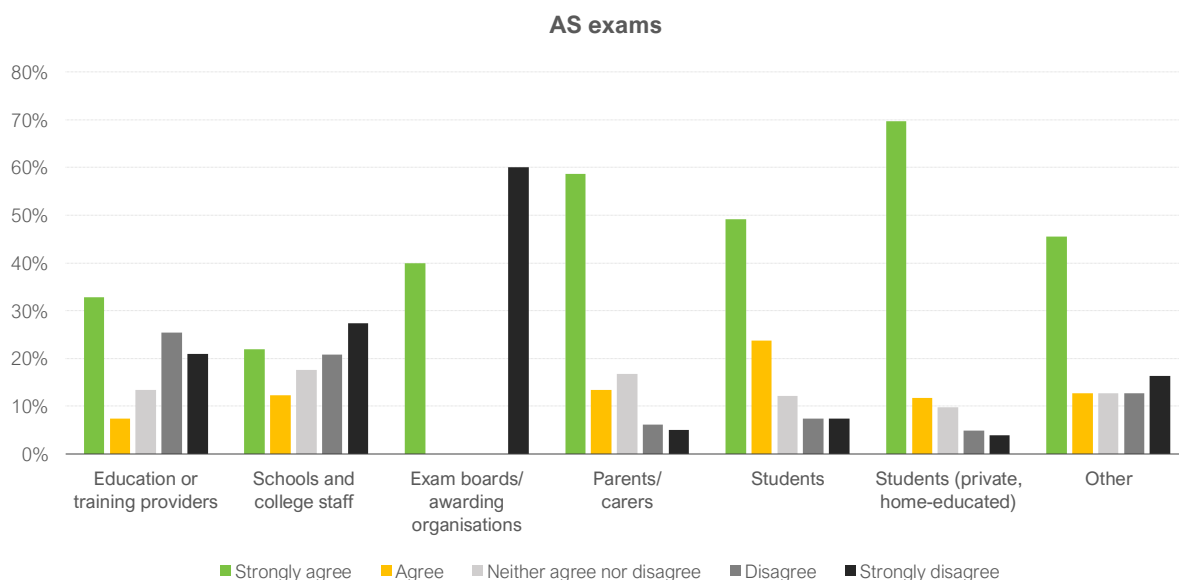


The majority of respondents agreed with the proposal that exam boards should be able to accept autumn exam entries from students who did not enter to receive a grade in summer 2021 but who, in the opinion of the exam board, would have entered for the summer 2021 exams had they taken place. More than 90% of private and home-educated students and more than 80% of parents and carers strongly supported this proposal. Education or training providers (60%), schools and college staff (49%), exam boards and awarding organisations (60%), as well as students and other respondents (62%), all showed a strong level of agreement. None of the exam boards and awarding organisations or private and home-educated students opposed this proposal.

Q3. To what extent do you agree or disagree that the autumn 2021 exams should be open to all students, regardless of any actual or planned intended entry in summer 2021? (GCSEs, AS, A level)

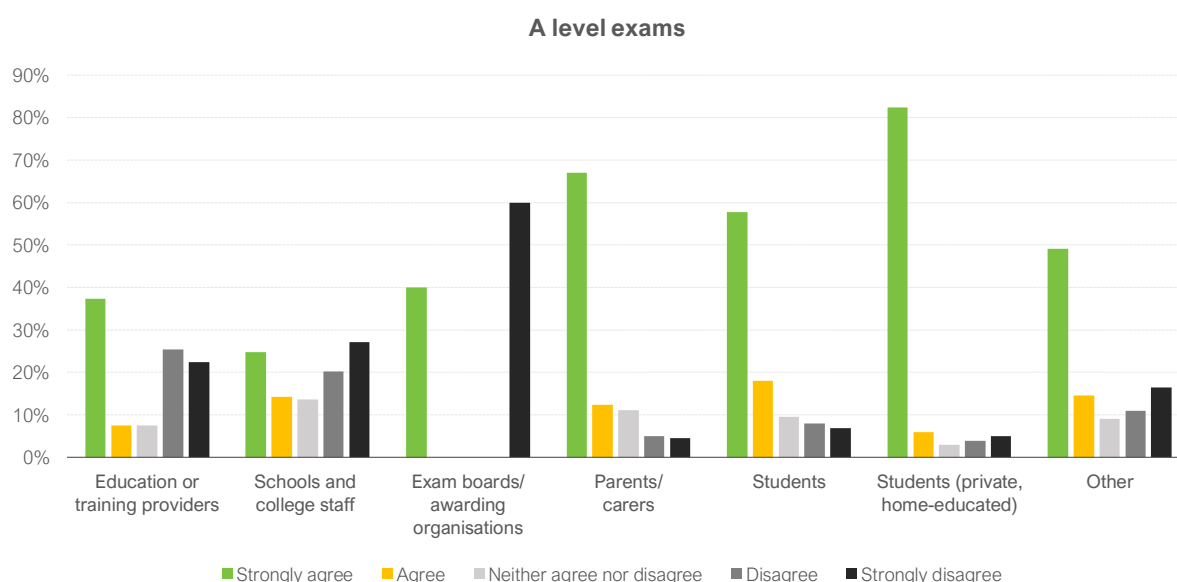


The answers to whether GCSE 2021 autumn exams should be open to all students varied among respondent types. There was strong support for this proposal from parents and carers (64%), students (55%), and private and home-educated students (75%). The majority of the respondent group “Other” supported the proposal (18% agreed and 47% strongly agreed), while 26% were against it (11% disagreed and 15% strongly disagreed). Responses to this question were fairly evenly split between education and training providers who were in favour (10% agreed and 37% strongly agreed) and those who were against (25% disagreed and 19% strongly disagreed). A similar response pattern was observed among schools and college staff (26% strongly agreed, 28% strongly disagreed). In contrast, 60% of exam boards and awarding organisations strongly disagreed with the proposal, while 40% strongly agreed.





Similarly to the previous question, the answers to whether AS 2021 autumn exams should be open to all students varied among respondent types. There was strong support for this proposal from parents and carers (59%), students (49%), and private and home-educated students (70%). The majority of the respondent group “Other” supported the proposal (13% agreed and 45% strongly agreed), while 29% were against it (13% disagreed and 16% strongly disagreed). Responses to this question were fairly evenly split between education and training providers who were in favour (7% agreed and 33% strongly agreed) and those who were against (25% disagreed and 21% strongly disagreed). A similar response pattern is observed among schools and college staff (22% strongly agreed, 27% strongly disagreed). As in the previous question, 60% of exam boards and awarding organisations strongly disagreed with this question, while 40% strongly agreed.



The responses to whether A level 2021 autumn exams should be open to all students follow a similar pattern to the questions related to GCSEs and AS autumn exams. Most parents and carers (67%), students (58%), private and home-educated students (82%), and other respondents (49%) strongly supported the proposal that all students should be able to sit the A level autumn exams. Responses to this question were relatively evenly split between education and training providers who were in favour (7% agreed and 37% strongly agreed) and those who were against (25% disagreed and 22% strongly disagreed). A similar response pattern was observed among schools and college staff (25% strongly agreed, 27% strongly disagreed). As in previous questions, 60% of exam boards and awarding organisations strongly disagreed with this question, while 40% strongly agreed.

Q4. Do you have any comments on which students should be able to take exams in autumn 2021?

Five hundred and eighteen respondents answered this question. This section highlights the main points these respondents provided in their answers.

A large number of these respondents commented that every student should be able to participate in the autumn exams, irrespective of whether they received a teacher assessed grade or whether they would have participated in the summer exams. Many respondents highlighted that students who did not receive any grade, mainly private, home-educated students, should have the right to sit the exams in autumn. According to some respondents, many private candidates could not receive a teacher assessed grade because they were not able to access a centre or tutor. Some private students did



not enrol with centres for the summer 2021 exams (due to costs or uncertainty), meaning that they might not be able to prove their intention to sit the summer 2021 exams.

"All students. But especially private candidates such as home educated students, who have been disproportionately affected by the changes to summer exams, both this year and last year." (Student – private, home-educated of any age)

"All candidates should be able to enter for exams in the Autumn. Private candidates, in particular, are having difficulty accessing exam centres this summer. Although the government promised that all candidates would be able to access a grade this summer, that has turned out not to be the case, with many centres only being willing to support grades where an existing tutor relationship was in place. Many private candidates will therefore be forced to wait until the Autumn. For some of them, this is their only way of getting a grade this year, and so it must be available to them." (Parent or carer)

"I see no reason why the Autumn series should be limited to only those who entered or intended to enter for the Summer 2021 series. If this limitation is applied, the definition of "intention" is critical since many private candidates, whilst working towards exams in Summer 2021, may have never actually entered with a private candidate centre such as ours. If they knew the exams were not taking place and that they were unable to receive an assessed grade, proof of "intention" could be tricky." (Other)

A vast majority of those who commented supported the idea that only some students should be able to sit the autumn exams. Many respondents noted that only those who would have taken the exams in the summer should have the right to enter the autumn exams, mostly to avoid overwhelming exam centres. Some respondents argued that only students who had received a teacher assessed grade should participate in the autumn exams.

"Allowing any and all students to sit would overwhelm exam centres. Students who were due to sit this summer are the ones who have been primarily affected, so they should definitely be allowed to sit. Whilst the government summer plans pay lip service to private candidates, the realities for schools or colleges which usually take them is that it is not practical to try and assess students we don't know, with teachers who are already trying to assess hundreds of enrolled students. [...] For that reason, private candidates are struggling to find any centres that are willing to accept them for summer 2021 so absolutely those who intended to enter should be included for autumn 2021." (Exams officer or manager)

"[The awarding body or exam board] believes that entry to an exceptional autumn GQ series following the cancellation of exams in summer 2021 should be restricted to those students who entered, or who definitely would have entered, the series." (Awarding body or exam board)

"Only students who received teacher assessed grades in summer 2021." (Exams officer or manager)

One exam board highlighted that it would be difficult to identify who would have entered the summer 2021 exams, had they taken place, and, thus, who should be eligible for the autumn exams.

"Although we can see why exam boards should be able to accept entries for the autumn exams from students who did not enter to receive a grade in summer 2021 but who, in the opinion of the exam board, would have entered for the summer 2021 exams had they taken place, we wish to highlight that it would not be possible to validate our 'opinion' on entry eligibility. We could monitor the profile of entries. We believe it is important to raise such issues at this point, to ensure Ofqual understands that if this is implemented, we may not pick up all cases of candidates who are not eligible for the autumn series. If this proposal proceeds, we ask Ofqual to clarify what it would expect of awarding organisations to meet such requirements. [...]" (Awarding body or exam board)

Other respondents argued that anyone who was unhappy with their grade (including students from the 2020 cohort) or anyone who had faced disruption due to the pandemic should have the right to participate in the autumn exams.

"Students should only be able to sit exams in Autumn in response to them not being happy with their grade. [...]" (Exams officer or manager)

"We feel that only those students who would, in usual circumstances, have taken exams in summer 2020 and 2021, and also those who remain unhappy with 2020 grade, should be able to take exams in autumn 2021. [...]" (Other)

"Any students in the cohorts that have faced disruption due to the pandemic." (Governor)

"There may be many reasons why some students are unable to receive a grade this summer (especially due to issues relating to prolonged absence due to the pandemic or impacts of lockdown) and then need to withdraw from the TAG process. It is important that those students who are still eligible to enter these series at A2 or GCSE level." (Exams officer or manager)

A few respondents commented that students who wanted to increase their grade should not be able to participate in the autumn exams.

"This year is different - there is an appeals process for students who feel their grades are incorrect/unfair. I, therefore, do not feel that they need another opportunity to take the exams later. It is also too complicated because it will not take into account any areas not covered due to lockdown, so they are more likely to get a worse grade. It would not be 100% like normal exams as well because no NEA is taken into account. [...]" (Exams officer or manager)

"Only students unable to receive a grade should be accepted. TAG has replaced exams and is based on TA. They are either an acceptable way to offer grades or not. They should not be used as a way to increase your grade. In a normal exam series, students would not be offered an exam series in Autumn but would be required to wait until the following year - excluding English and Maths. All students have a right of appeal against their TAG." (Exams officer or manager)

Many respondents expressed concern about autumn exams distracting students and adding more pressure to candidates. They also questioned whether autumn exams should take place at all.

“To what end would the examinations serve a purpose. If teacher grades have been evidence-based, have gone through moderation, and are set after an appeal, they surely reflect student capability. If students want to sit exams, they will need guidance and support, and this will distract them from their studies at the next level. I am unsure about how students would cope with the demands of A level and preparing for examinations at GCSE. Surely, it is better to keep up to date with the studies that are relevant to them at the stage.” (Senior Leadership Team)

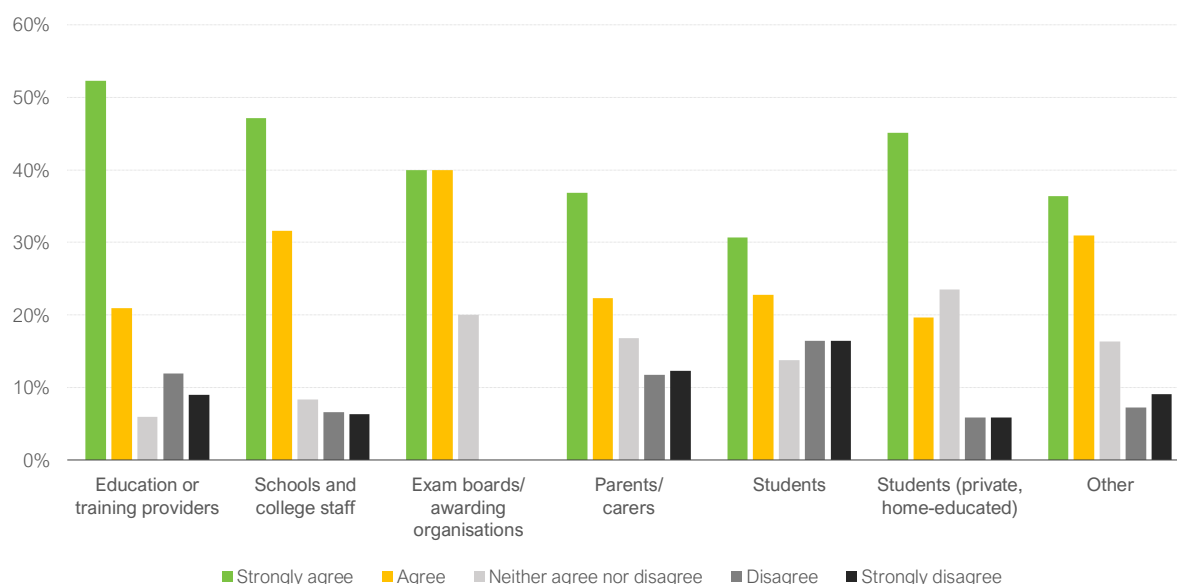
“Neither schools nor individual students should be facing a decision as to whether they should face exams in Autumn 2021. Do your best with summer 2021 awarding, do your best to encourage fairness among and across centres, forget about comparison with non-COVID years and cohorts, trust teachers. Don't destroy any chance of a real, fresh start with a hangover assessment opportunities. The very students who shouldn't be doing any such thing will put themselves under pressure to sit any additional exams on offer. The work required in order to prepare for Autumn exams will snowball into an additional pressure effect on the requirements on students for 2021/22. Whether still at school or not, they need to restart their lives from 1st September and not with a deficit outlook. (Governor)

How students should be assessed

QUESTIONS COVERED IN THIS SECTION This section explores respondents' views on how students should be assessed in the autumn 2021 exams. Ofqual suggests that for all subjects except for art and design qualifications, students' grades should be based only on exam performance; non-exams assessment should not be considered in autumn 2021 exams. For art and design qualifications, students would be assessed based on an exam board's set task.

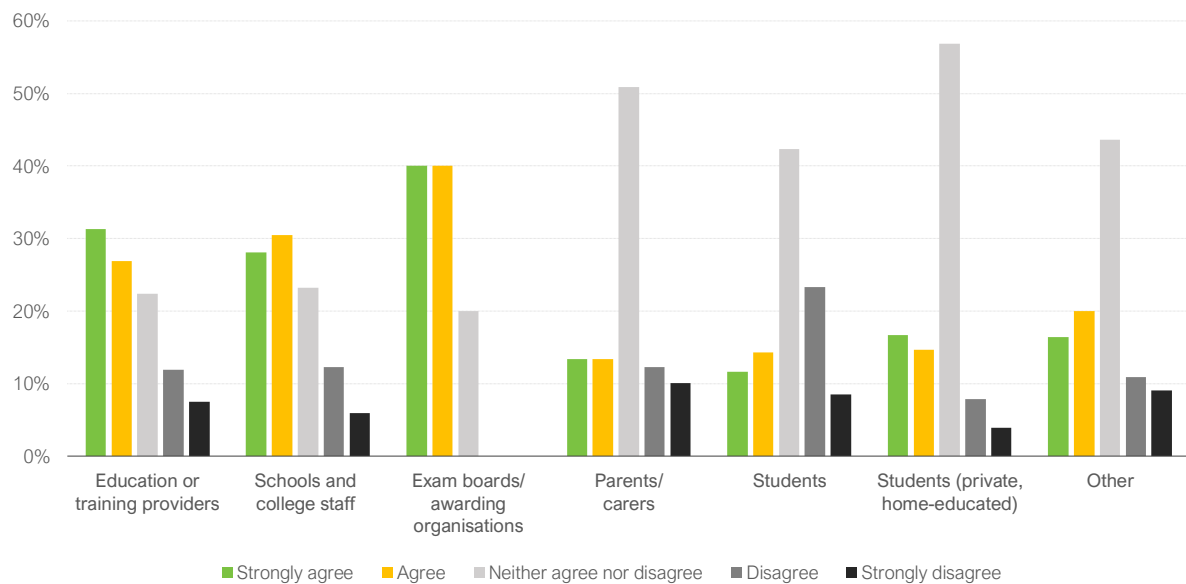
This section covers questions 5 to 9 in the consultation.

Q5. To what extent do you agree or disagree that students entering GCSE, AS or A levels in autumn 2021 should be assessed on their performance in exams only?



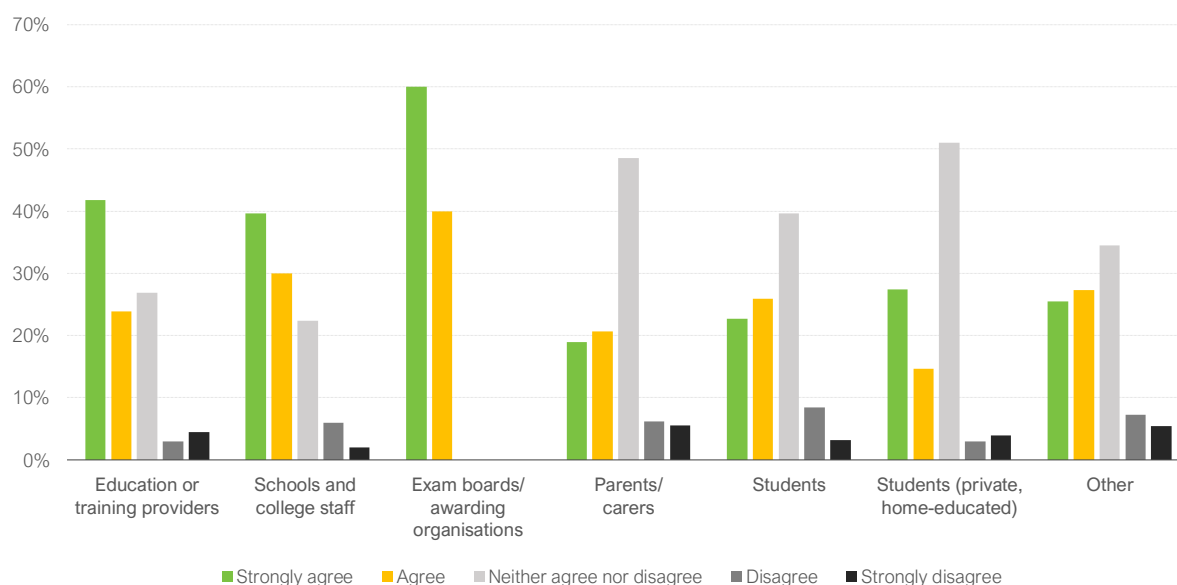
Most respondent groups shared similar views towards the suggestion that students entering GCSE, AS, or A levels in autumn 2021 should be assessed on their performance in exams only. The majority of education or training providers (73%), schools and college staff (79%), exam boards and awarding organisations (80%), parents and carers (59%), students (54%), private and home-educated students (65%), and other respondents (67%) agreed or strongly agreed with this proposal. Moreover, none of the exam boards and awarding organisations disagreed with the proposal that students entering the autumn exams should be assessed on their performance in exams only.

Q6. To what extent do you agree or disagree that students entering GCSE, AS or A level art and design should be assessed on their performance in an exam board set task only?



A large share of parents and carers (51%), students (42%), private and home-educated students (57%) and other groups (44%) neither agreed nor disagreed with the proposal that students entering GCSE, AS, or A level art and design should be assessed on their performance in an exam board set task only. In contrast, the majority of education and training providers (58%) and schools and college staff (58%) agreed or strongly agreed with the current proposal. For exam boards and awarding organisations, most respondents agreed (40%) or strongly agreed (40%) that students should be assessed in an exam board set task only. No member of this respondent group opposed this proposal.

Q7. To what extent do you agree or disagree that students' work in response to the art and design tasks should be marked by the exam boards?



Many parents and carers (49%) and private and home-educated students (51%) neither agreed nor disagreed that students' work in response to the art and design tasks should be marked by the exam boards. Students' responses were almost evenly split between those who supported the proposal (26% agreed and 23% strongly agreed) and those who neither agreed nor disagreed (40%). The majority of education or training providers (66%), schools and college staff (70%), as well as other respondents (52%) agreed or strongly agreed with the current proposal. Moreover, all respondents from the exam boards and awarding organisations supported the proposal, with 40% agreeing and 60% strongly agreeing that, in art and design qualifications, students' work should be marked by the exam boards.

Q8. Do you have any comments on our proposal that, with the exception of art and design qualifications, grades should be determined by students' performance in exams only?

Two hundred and fifty-three respondents answered this question. The main themes that emerged from their views are presented below.

The majority of respondents agreed that grades should be determined by students' performance in exams only. Several respondents argued that this approach would be fair for everyone, particularly for home-schooled students.

"An equal playing field for all." (Exams officer or manager)

"Assessment through exams only will ensure completely fair results without the need to worry about normal students having an advantage over private students who will not have done any previously assessed work." (Student – private, home-educated of any age)

Other respondents who agreed with this proposal suggested that running non-exam assessment (NEA) for autumn would be burdensome. They further noted that students and staff should instead focus on the new academic year.

"It would be impossible for students to complete a 35-hour NEA project in D&T at the start of the new academic year. There is already increased pressure on schools to enable students to 'catch up' on missed practical skills, particularly for those students entering 2022 exams. NEA usually starts in the summer term, and most schools run it through until the spring term of the following year - it would be unfair on students and schools to repeat this in such a short time frame." (Teacher responding in a personal capacity)

"It would be impossible to expect NEAs to be included as many will have started on their next courses, and, to start a new course, revise for the full content of an old course and to complete an NEA would be overly burdensome." (School or college)

Some respondents disagreed with this proposal, suggesting that assessment based only on exams would be unfair for some students. For example, students who have strong research and analytical skills and perform well in non-exam assessments would be disadvantaged by this proposal. Additionally, some respondents argued that there are students who spent time preparing coursework. If they knew earlier about the newly suggested approach, they could have spent their time preparing for the exams instead.

"Subjects with significant practical components should have to produce practical work as part of the assessment, otherwise it is unfair on students whose strength is practical and would allow students whose weakness is practical work to secure a higher grade than they otherwise would have. NEA that is more essay-based is not needed." (Exams officer or manager)

"An example is the History NEA for A level history. I don't spend hours researching and writing my essay for it to not count towards my grade. If I knew it would be irrelevant, I would've focused on learning exam content instead. It is unfair to say that non-exam assessments will make up our grade then take them out. I think it should be up to the student whether they want these NEA's to be used or not." (Student)

Other respondents, who disagreed with the proposal, stated that the assessment of some courses with practical components, such as D&T or performance-based subjects like drama, music, or dance, should not be based only on one exam. According to some respondents, for these kind of subjects, not considering practical components or performance could bring into question the validity of the qualification.

“Other areas, in particular Drama, Dance, Construction etc., which have a practical element vital to show full skills in this qualification subject area, would need to have the opportunity to show their abilities in these units and not just an exam.” (Exams officer or manager)

“Drama, music, dance etc. may need other arrangements.” (Teacher responding in a personal capacity)

“As with the autumn 2020 series, members have serious concerns about the omission of non-exam assessment for autumn 2021 and the impact this would have on the validity of the grades. [...] To overlook an assessment of those practical or performance skills would therefore raise serious questions about the validity of that qualification. [...] As mentioned in other places, whilst the upside of an autumn series could be an opportunity for some students to get another chance at a grade, members would question the value of this if the validity of the grades is compromised [...]” (Other representative or interest group)

Some respondents noted that non-exam assessments should be considered if they are completed and where possible. A few respondents suggested that students should be able to decide whether they want their non-exam assessment to be considered in their final grade.

“NEA work completed should be included in the determination of grades where possible.” (Parent or carer)

“Where possible, all NEA should be counted.” (Senior Leadership Team)

“[...] These individuals have been seriously disadvantaged, and some have suffered in more ways than we can imagine. There should be a flexible approach giving individuals a wide range of options, including the use of course work, if available. The approach should be flexible, which means entirely exam-based for some and where wider evidence/ coursework is available used for others.” (Parent or carer)

“There should be an option to use NEA where the student feels it is sufficiently complete to be beneficial.” (Exams officer or manager)

Q9. Do you have any comments on our proposed approach to art and design qualifications?

One hundred and seventeen respondents answered this question. This section sets out the key points highlighted by the respondents.

Some respondents agreed with the proposal that, regarding art and design qualifications, tasks should be set and marked by the exam boards to alleviate the burden on teachers. Additionally, other respondents in favour of this proposal stated that students who would want to be re-examined in autumn would probably be disappointed by their teachers' grades in the summer. These students would most likely want their tasks to be externally assessed in autumn.

"Agree that boards marking the work will alleviate teacher burden at the start of a new term." (Exams officer or manager)

"Even though the Summer 2021 Art examination will be marked and graded by the teacher, I feel that a student who sits the examination again in the Autumn should have their work marked by the exam board. The only students choosing to sit the exam in the Autumn will be disappointed with their original grade and therefore need the Autumn grade to be set externally." (Exams officer or manager)

"Any assessment for any qualifications should be assessed by the boards only to ensure the quality of marking." (Other)

Some respondents were concerned about schools' capacity to accommodate and support students who would undertake the task in autumn.

"It may be that students would require access to specialist rooms in order to complete the set tasks - what if a centre doesn't have the capacity to provide this for the length of time it is needed? Would students be given pre-release material to support their research, and which would be submitted as part of the entry?" (Senior Leadership Team)

"The difficulties in accommodating art examinations have already been mentioned. Concerns about the length of the exam and research period and how this would fit in with a timetable of level 3 subjects alongside this." (Exams officer or manager)

"Concerned as to how this will be facilitated in school when limited resources are available." (School or college)

"We do not have the physical capacity to conduct GCSE and A level Art exams without cancelling classes for current groups who already missed enough." (School or college)

Some respondents who agreed with a task set by the exam board in autumn suggested that it should be assessed by teachers and moderated by the exam boards. Others stated that teachers would be the most suitable to assess their students' work.

"Work should be marked by teachers with exam board moderation in the usual way." (Academy chain)

"[...] I regard art and design teachers and departments as fundamentally capable of assessing fairly and accurately their own students' success in artistic and design endeavours, and I trust them fully to set their own tasks and assess their own students' work. From what I have seen of exam boards and their specifications, examiners, and others responsible for dictating course content are essentially remote from the realities of subjects as they are taught and learned in schools, and while those creating these specifications, exams, and assessment tasks are no doubt qualified experts in their subjects [...], they are certainly no better at assessing students' learning than the teachers and schools themselves, and in some cases probably much worse - particularly, I suspect, in creative subjects like art and design." (Teacher responding in a personal capacity)

There were also comments stating that students' grades should be based on their portfolio and their performance in a task.

"Art and design qualifications should be based on all previous work, not just an exam. As someone who is taking an art course, the thought of other work being disregarded is frustrating." (Student)

"If practical, students should have the option of combining their existing teacher-assessed portfolio grade from the summer with the grade from an exam task in the autumn, effectively completing the full qualification across two sessions. This would not help everyone, but I cannot see the harm in offering it." (Student – private, home-educated of any age)

A small proportion of respondents suggested that there should not be any further assessment in autumn, as students will be graded on the basis of their portfolio in summer 2021. Moreover, there were a few respondents who appeared to have misunderstood the proposal that students who want to enter GCSE, AS or A level art and design in autumn 2021 should be assessed on their performance in an exam board set task only. These respondents thought that art and design students would have to sit an actual exam in the 2021 autumn series, and they argued that there should be no exams for this kind of subject, highlighting that they could cause stress to students.

"Students already had the opportunity to demonstrate their skills in the portfolios they have put together over the course. I would suggest that this is one of the subjects where no further exam is required." (Exams officer or manager)

"I think such subjects are too subjective to be dealt with entirely by time-constrained examination, which is peculiarly artificial in these subjects. Many students taking these subjects have picked them precisely because they are not particularly good at exams, but in the real world can produce extremely good work. Such factors need to be taken into account. [...]" (Parent or carer)

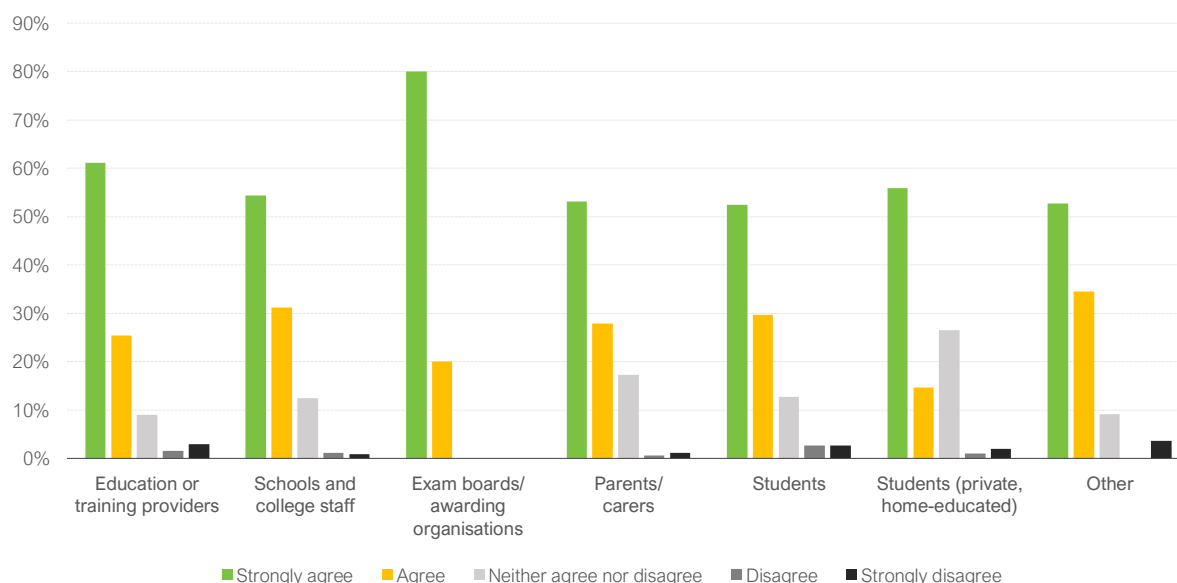
"Preparing for an exam in a non-exam-based subject will put huge stress on students, who are worried and stressed enough already." (Teacher responding in a personal capacity)

Grades for practical skills and spoken language

QUESTIONS COVERED IN THIS SECTION This section focuses on the proposal that students who will enter the autumn 2021 exams can carry forward their grades for practical science and geology skills, as well as grades for spoken language in GCSE English language and GCSE MFL. Students who do not have this grade or want to improve it could be assessed in autumn. This, however, depends on schools' and colleges' willingness and capacity to accommodate these assessments. Respondents were asked to express their views on whether students should be able to carry forward their grades on practical and spoken language skills.

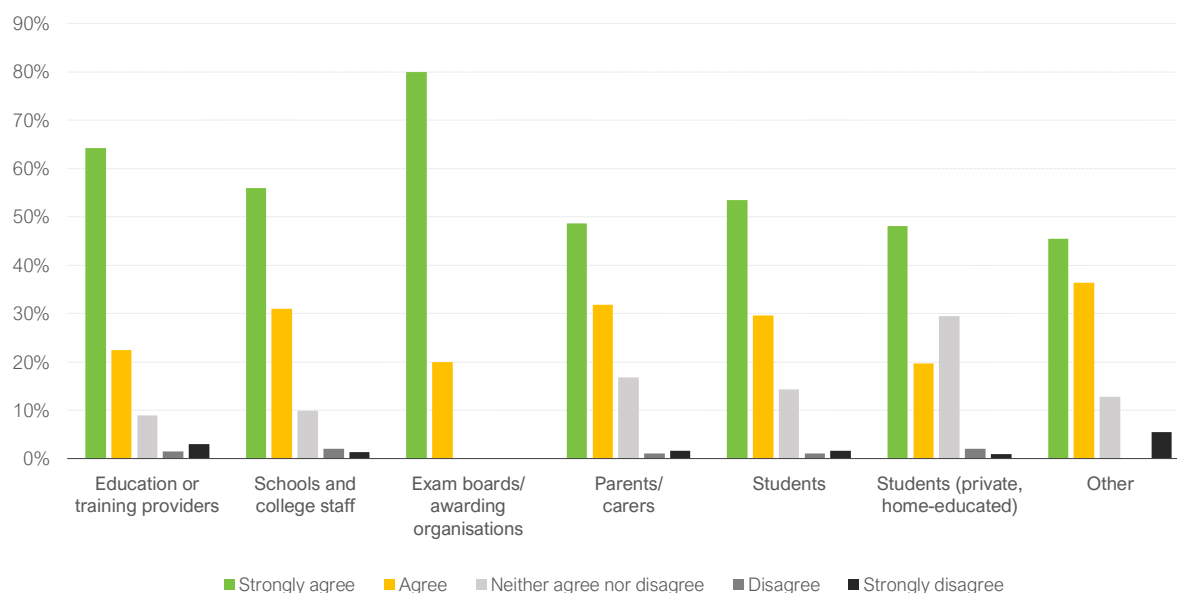
This section covers questions 10 to 12 in the consultation.

Q10. To what extent do you agree or disagree that students should be able to carry forward any grade for practical science and geology skills to the autumn 2021 series?



The majority of respondents strongly agreed with the proposal that students should be able to carry forward any grade for practical science and geology skills to the autumn 2021 series. Over half of respondents across all respondent types strongly agreed with the proposal (ranging from 52% of students to 61% of education or training providers), with fewer than 5% of respondents disagreeing or strongly disagreeing with the proposal. The proportion of respondents who stated they did not agree or disagree with the proposal was generally low, except for private or home-educated students (26%).

Q11. To what extent do you agree or disagree that students should be able to carry forward any grade for spoken language in GCSE English language and modern foreign languages?



As in the previous question, most respondents strongly agreed that students should be able to carry forward any grade for spoken language in GCSE English language and modern foreign languages. Fewer than 5% of respondents across all respondent types disagreed or strongly disagreed with this proposal. Schools and college staff had the highest proportion of respondents who agreed or strongly agreed with the proposal (87%). Private or home-educated students had the lowest proportion of respondents who agreed (or strongly agreed) with the proposal (68%).

Q12. Do you have any comments on our proposed approach to the separately reported grades for A level practical science and geology skills and for GCSE English language and modern foreign language spoken language skills?

A level practical science and geology skills

Ninety-three respondents answered this question. The key themes emerged from the respondents' answers are summarised below.

Most of these respondents agreed with the proposal of carrying forward the practical skills grade for A level science and geology courses. Many of them stated that this approach should be followed as would be the case in any normal year. Some others also highlighted that it was essential for students to be able to carry forward their grade, especially for students who had already left the school.



"I believe it only fair for students to be able to carry forward their previous practical science grades as is the case with any normal year. Some students will be re-sitting their exams after receiving their grades last year, such as myself. I have already attained grades for my science practical endorsements, and so I have not completed practicals this year, as it was not necessary. With the current exam situation, I will need to carry forward my previous practical grade, as that was the impression given at the start of the year, and so it is only fair to be able to do so." (Student – private, home-educated of any age)

"Once a student has left the school/college, it may be harder for those students to be able to redo the practical element by themselves, so yes, they should be able to take this practical report forward." (Student)

"This would be normal practice for any "re-sit" under normal exam conditions." (Exams officer or manager)

Other respondents stated that students should be able to decide whether they wanted to carry forward their practical skills grade. Students who pass the practical skills endorsement should be able to carry it forward. Others who are unhappy with their result should be able to be re-assessed in autumn.

"It seems sensible that, where a separately reported grade is given, and the student is happy with it, to not duplicate and create extra work. However, where a student is unhappy, they should have an opportunity to re-sit this. However, this would need to be stated at the time of entry so that exam centres are able to prepare." (Teacher responding in a personal capacity)

"I personally prefer not doing practicals, but if a student truly believes it affected their grade, then they deserve that chance." (Student)

A few respondents stated that students who faced disruption due to the pandemic should also have the chance to have their practical skills re-assessed in autumn. Some respondents suggested that, due to the pandemic-related difficulties students encountered this year, the practical skills grades should not be reported.

"Only if students were unable to achieve their practical endorsement for lockdown reasons should the school be able to attempt to facilitate this in the early autumn term." (Teacher responding in a personal capacity)

"Many Science A level students will have been unable to carry out any of the assessed practical tasks during 2020/21, or they may have done insufficient to merit awarding a Pass grade. Maybe it would be fairer, for this year only, not to report a practical mark at all." (Private training provider)

"Since it has been very difficult for many students sitting A level sciences to secure a practical endorsement this year, particularly private candidates due to the lockdown, I don't believe it should appear on the certificate at all. It's unfair if it does." (Parent or carer)

Many respondents expressed concern around providing students with the opportunity to have their practical skills re-assessed in autumn. In particular, they were concerned about schools' capacity to accommodate these assessments and the extra resources needed, particularly teachers' time.

"This is an unnecessary burden on teachers who are already doing a lot of extra marking in the summer and will have to deal with the lack of proper preparation of new year 12 students." (Teacher responding in a personal capacity)

"I don't think schools will have the time and facilities to assess students who have left; personal appointments and separate facilities would need to be arranged to perform any assessment, and as the students are likely to be at college, this would be outside of the teaching and administration staff working day. Their grades should be carried forward." (Exams officer or manager)

"Asking staff to assess these grades for any students who do not have them or wish to improve on them will be impossible given that they will have new teaching commitments." (Senior Leadership Team)

"Putting in place arrangements for redoing practicals will be challenging for schools. Being assessed on this in the autumn should not be an option." (School or college)

GCSE English language and modern foreign language spoken language skills

One hundred and five respondents answered this question. This section summarises the key points highlighted by the respondents.

Most of these respondents agreed with the proposal of carrying forward the spoken language skills grade for GCSE English language and modern foreign languages.

Particularly for GCSE English language, many respondents stated that this approach should be followed as in any normal year. Some respondents in favour of carrying forward the grades remarked that a potential assessment of the spoken language endorsement in autumn would further burden schools and teachers. Resources, such as rooms and time, would be needed to accommodate spoken language assessments in autumn.

"Do this as near to normal as possible. So, carrying forward is fine if it has been done as usual." (Parent or carer)

"Teachers will have new year groups to teach and therefore not have the resources or time to repeat formal speaking tests." (School or college)

"Putting in place arrangements for redoing spoken assessments will be challenging for schools. Being assessed on this in the autumn should not be an option." (School or college)

Some respondents who agreed with the proposal stated that it would be essential to provide the opportunity to re-sit spoken language assessments in autumn to those who want to improve their grade. Some of them stated that schools and colleges should be instructed to accommodate these assessments.



"Fully agree, but they should also have the opportunity to improve on their grade in the autumn. I don't see any barriers to performing practical language assessments via Zoom, Skype, WhatsApp etc."
(Consultant)

"If a student does not want their spoken language grade to be carried forward / considered from their former school, there should be an opportunity for independent assessment via the exam board. It is important that those with pass or merit are provided with the opportunity to re-sit this element of the course, independent of the school's assessment." (Parent or carer)

"It is a positive move to allow students to carry their spoken language skills grade forward, but if a student wishes to improve on that assessment, the centre SHOULD be instructed to offer the opportunity, not given a choice ('if they are willing') with regard to this provision. All students should be given an equal opportunity to improve their skills grade as this might impact on an offer made by an institution offering progression qualifications or work-based placement provision." (Local authority)

"[...] The proposal says, 'Students who do not have such a grade to carry forward, or who want the opportunity to improve that grade, could be assessed in the autumn term if their school or college is willing to provide for this'. The keyword is 'IF' here, and schools may not want to get involved here, especially if students are not or no longer on the roll. Maybe if schools/centres were obliged to, it might be different." (Parent or carer)

A small proportion of respondents disagreed with the carrying forward option. They felt that the spoken language endorsement might have been inequitably delivered due to the pandemic.

"If a student is entered for the Autumn series, they should have the chance to re-sit these spoken units, as the Summer 2021 were not awarded in the same way across all centres." (Exams officer or manager)

"I can't comment on English language, but for modern languages, GCSE candidates would only have had an endorsement. My recommendation is that in autumn, there should be speaking exams in full for GCSE and A level MFL candidates." (Teacher responding in a personal capacity)

A few respondents suggested alternative solutions. For example, some respondents proposed that candidates who do not have a spoken language endorsement grade could record themselves and send over the recordings to the exam boards for assessment. A few others suggested that spoken language endorsement grades should not be reported.

"Students who do not have a grade to carry forward should be able to record themselves and send it through to the exam board for marking to deem if it is worthy of a pass, merit, or distinction." (Teacher responding in a personal capacity)

"What about candidates unable to be awarded GCSE MFL in 2020 and 2021? They may not have an endorsement to carry forward. Centres may find it difficult to do an endorsement for a language they do not teach. Could there be an option to award GCSE MFL without the speaking endorsement or have a recorded and board marked endorsement?" (Exams officer or manager)

Although out of the scope of the present question, a few respondents expressed their concern about the special case of Community language candidates who might not have a spoken language grade to carry forward, as it would not be easy for these candidates to find qualified teachers who can assess their spoken language skills in the autumn term.

"This would raise problems for community languages that are not taught in school. There is always a problem with finding someone qualified to assess the students." (Exams officer or manager)

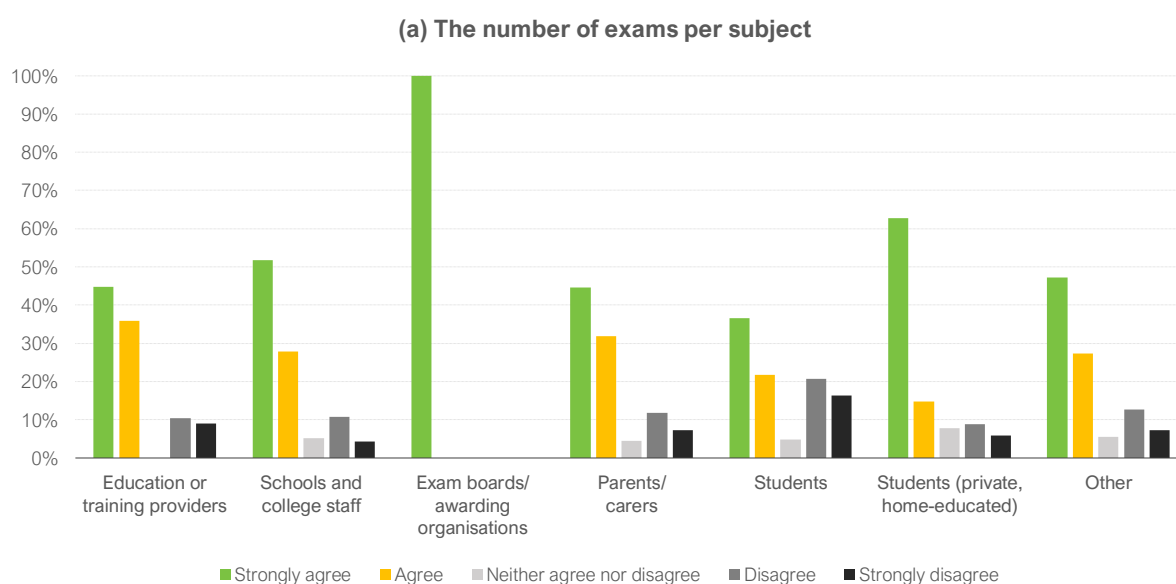
"My comment is regarding this statement - Students who do not have such a grade to carry forward, [...] could be assessed in the autumn term if their school or college is willing to provide for this. My centre has some private candidates who wish to take qualifications in their community languages. For Summer 21, we have been allowed to use external assessors to submit the speaking endorsement grades (if we do not have any teachers with the required experience or qualifications for these languages). Will this option be available to us and our candidates for Autumn 21 too? I would hope that those students who wish to obtain an endorsement grade could do so with centres who are willing to work with external assessors." (Senior Leadership Team)

The form of exams

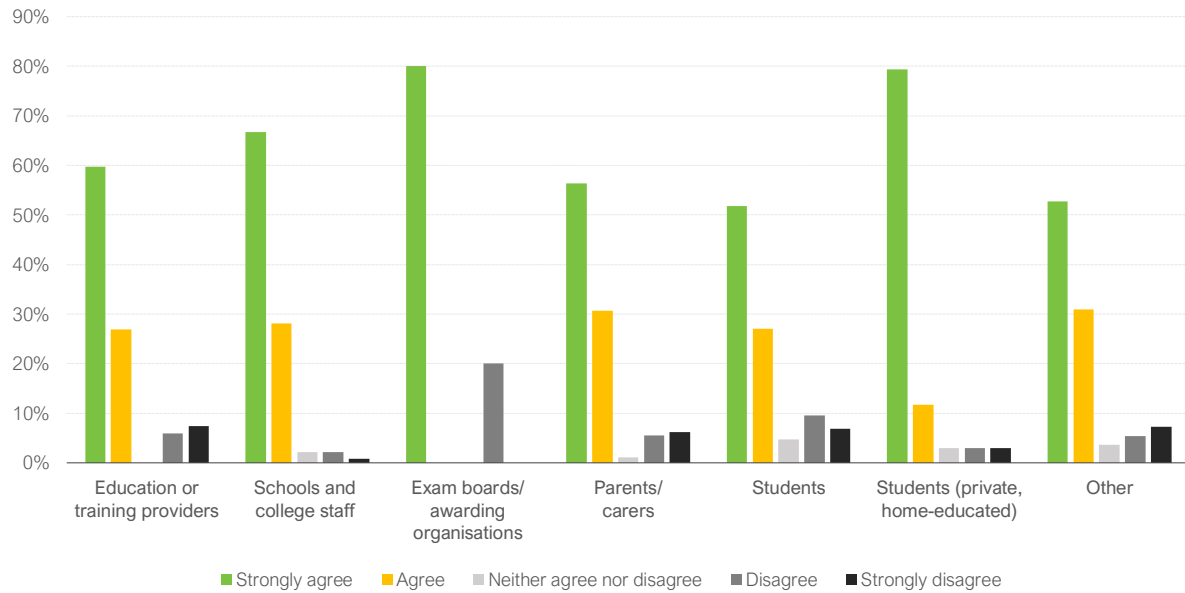
QUESTIONS COVERED IN THIS SECTION In this section, respondents were asked to express their views on whether the autumn exams should be in their normal form in terms of the number of exams per subject, the style of the questions, the format of the papers, and the conditions under which exams are taken. This section also includes questions on whether students should be provided with information about the topics before the exams and extra supporting material during the exams. It is proposed that the autumn 2021 exams should be delivered in their normal form, without the provision of information before the exams and extra supporting material during the exams.

This section covers questions 13 to 16 in the consultation.

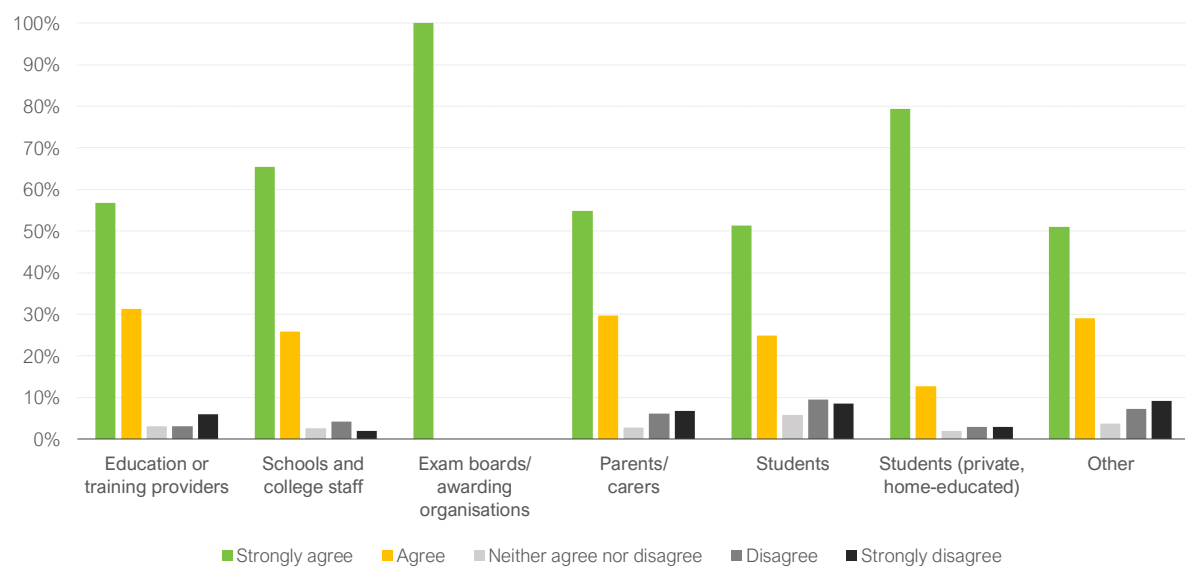
Q13. To what extent do you agree or disagree that the autumn exam papers should be in their normal form, in terms of: (a) the number of exams per subject (b) the style of the questions (c) the format of the papers (d) the conditions under which they are taken?



Respondents generally agreed that autumn exam papers should be in the normal form with respect to the number of exams per subject (around 80% chose “Agree” or “Strongly agree” for all respondent types except for students). Just over one-third (37%) of students disagreed with the proposal, the highest proportion among respondent types, while relatively few respondents stated they neither agreed nor disagreed with the proposal (fewer than 10% of respondents across all respondent types).

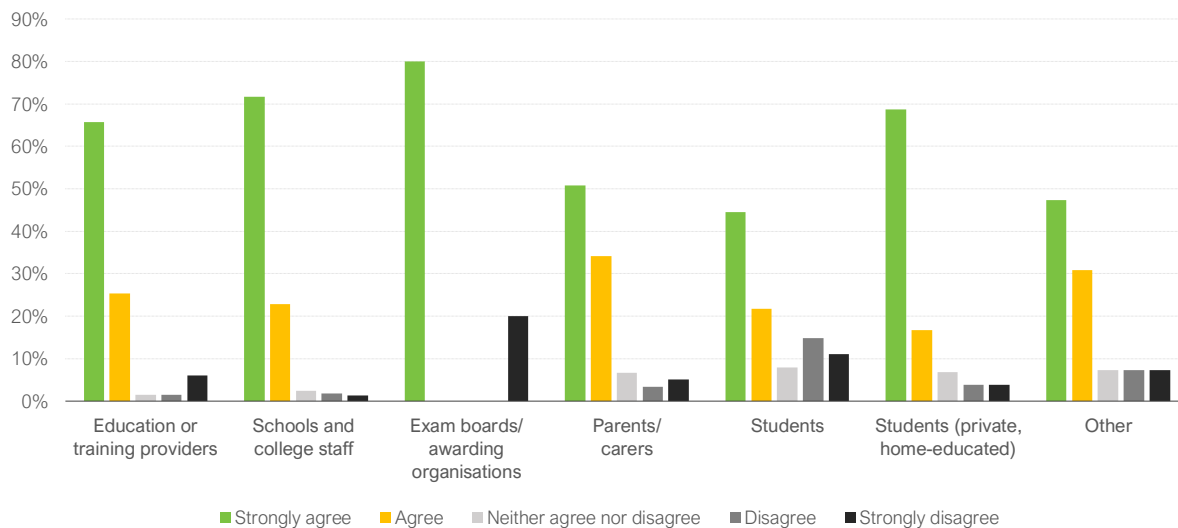
(b) The style of the questions

As with the previous question, most respondents agreed that autumn exam papers should be in their normal form in terms of the style of questions; over 75% of respondents across all respondent types stating they agreed or strongly agreed with the proposal. Nearly 80% of private or home-educated students strongly agreed with the proposal, while 17% of students disagreed with the proposal, the highest proportion across all respondent types. Very few respondents noted they neither agreed nor disagreed with the proposal (fewer than 5% across all respondent types).

(c) The format of the papers

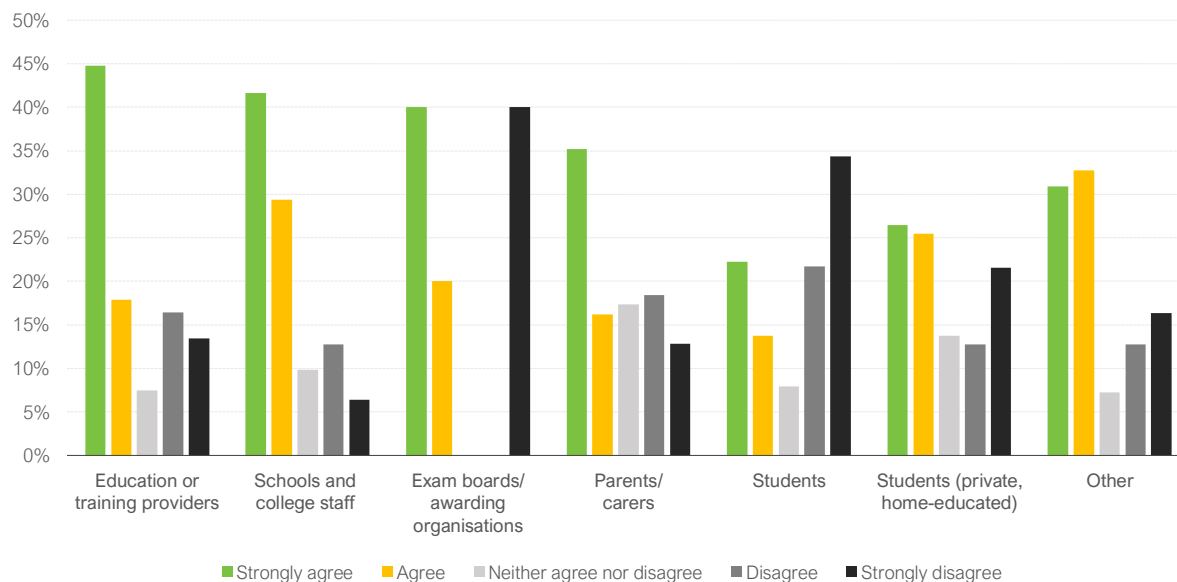
Most respondents supported the format of papers retaining their normal form for the autumn exam series, with over 80% of all respondent types except for students stating they agreed or strongly agreed with the proposal. Support was strongest among private and home-educated students, with 79% of respondents strongly agreeing. Around 76% of students agreed or strongly agreed with the proposal, while 18% disagreed with the proposal, the highest proportion across all respondent types (followed by 16% of other respondents). As with the previous question, relatively few respondents neither agreed nor disagreed with the proposal.

(d) The conditions under which autumn exams are taken



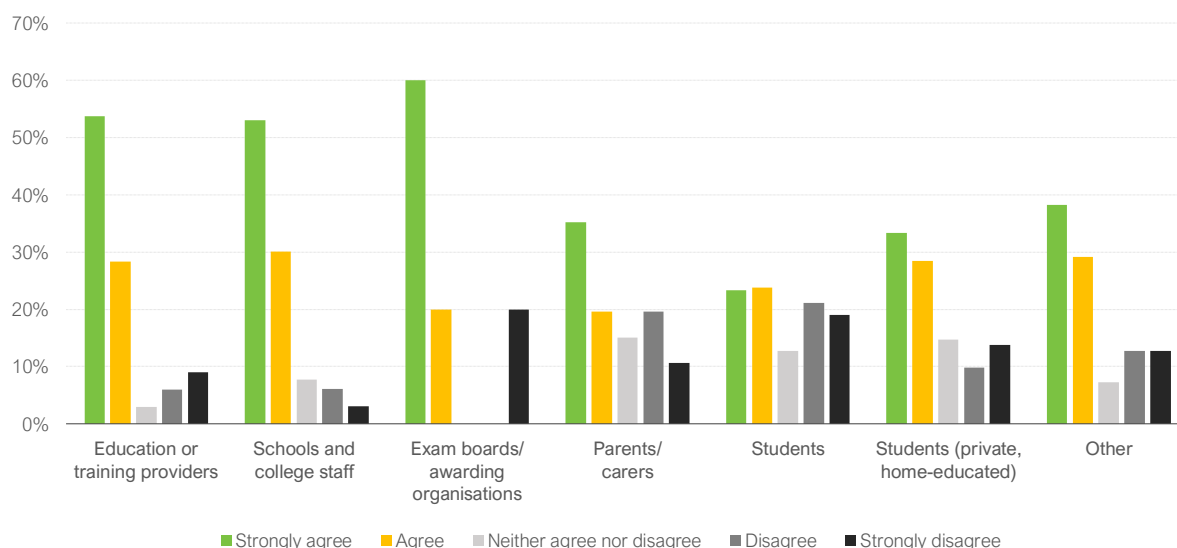
The majority of respondents agreed or strongly agreed with autumn exam papers keeping their normal form in terms of the conditions under which they would be taken. It is noteworthy that 26% of students disagreed with the proposal—the highest proportion out of all respondent types. Support was strongest among schools and college staff (95% agreeing or strongly agreeing with the proposal) and education or training providers (91% agreeing or strongly agreeing with the proposal).

Q14. To what extent do you agree or disagree that students should not be given advance information about topics that will be included in the autumn exams?



Respondents were generally opposed to providing advance notice of topics included in the autumn exams. Except for students, a majority of all other respondent types agreed or strongly agreed that students should not be given advance notice. Opposition to advance notice was strongest among schools and college staff (71% agreeing or strongly agreeing) and education or training providers (63% agreeing or strongly agreeing). However, students supported advance notice of topics, with 56% disagreeing or strongly disagreeing—35% of private or home-educated students also disagreed with the statement. Moreover, 60% of the exam boards agreed or strongly agreed that students should not be given advance information about topics that will be included in the autumn exams, while 40% strongly disagreed with this statement.

Q15. To what extent do you agree or disagree that students taking autumn exams should only have access to the usual support materials when taking an exam?





The majority of respondents agreed that students should only have access to the usual support materials when taking autumn exams. As with the previous question, support was strongest among education or training providers (82% agreeing or strongly agreeing) and schools and college staff (83% agreeing or strongly agreeing). Students were more evenly divided, with 47% agreeing or strongly agreeing that only the usual support materials should be allowed and 40% disagreeing or strongly disagreeing. Around 15% of parent or carers, students, and private/home-educated students neither agreed nor disagreed with the proposal, with smaller proportions for other respondent types.

Q16. Do you have any comments on our proposals about the form of the autumn 2021 exams?

As evidenced above, most respondents supported the proposal that the autumn 2021 exams should be in their normal form. However, the majority of consultees who addressed this open question opposed Ofqual's proposal. Three hundred and six respondents answered this question. The main elements of the respondents' answers are presented below.

Many respondents who opposed the proposal highlighted that students would not necessarily get the support they needed to perform well on exams if they were to be held in the normal format. These respondents focused on the idea of fairness or levelling the playing field, as students may not have been taught or exposed to the full curriculum due to repeated school closures and would be forced to balance new courses with revising for exams once the new term begins.

"Pupils will not get the teaching or support to prepare for these exams if they are in their normal format. Most will have left their secondary school, and colleges/6th forms will not have the capacity to provide additional teaching. Also, pupils will have started on their new courses so [they] will not have the learning capacity to catch up on the topics they have missed. All pupils will be at a different stage in each subject depending on the amount/quality of teaching they received during the lockdown." (Exams officer or manager)

To help students compensate for the challenging academic environment over the past year, respondents called for exam boards to provide supplementary materials for preparation or revisions to the format/structure of exams to reduce inequalities between students. Many of these respondents noted that advanced notice of topics would help students who had missed a lot of classroom time and had to self-prepare during the summer.

"I understand the way in which we want to keep everything as normal and routine as possible, and not take out certain topics so we all know what's on it, but we should be given an advance notice of topics on the paper, I'm not saying to leak the questions or anything, but it at least gives us a chance with what to expect." (Student)

"The least the exam boards can do is to produce some support materials for students prior to the exams. Without this, you risk discriminating against students based on whether they were awarded a grade in the summer or autumn and providing an uneven playing field in terms of how to achieve a particular grade using the two assessment methods." (Senior Leadership Team)

Other potential changes suggested by respondents included offering a broader choice of questions to increase the likelihood that students could find a question that covered materials they had been taught, providing formulas and equations for maths and sciences exams, extending the exam duration, or requiring fewer sections and/or smaller amount of content to be completed.

“Although an additional burden to the exam boards, exam papers may be able to include a bigger choice of optional questions to cover a wider range of the specification so that candidates have a better chance to find a question that they had been taught.” (Exams officer or manager)

“I think a greater choice of questions should be given so that students are not forced to answer WQs [Written Questions] about material covered in any of the three lockdowns that have affected their course.” (Teacher responding in a personal capacity)

On the other hand, many respondents who supported Ofqual's proposal said it was important to keep exams as normal as possible to ensure consistency and comparability with previous years. If adjustment measures were introduced for exams, universities or employers might not value exam grades as much as they would have otherwise. This view was mostly supported by teachers or exams staff.

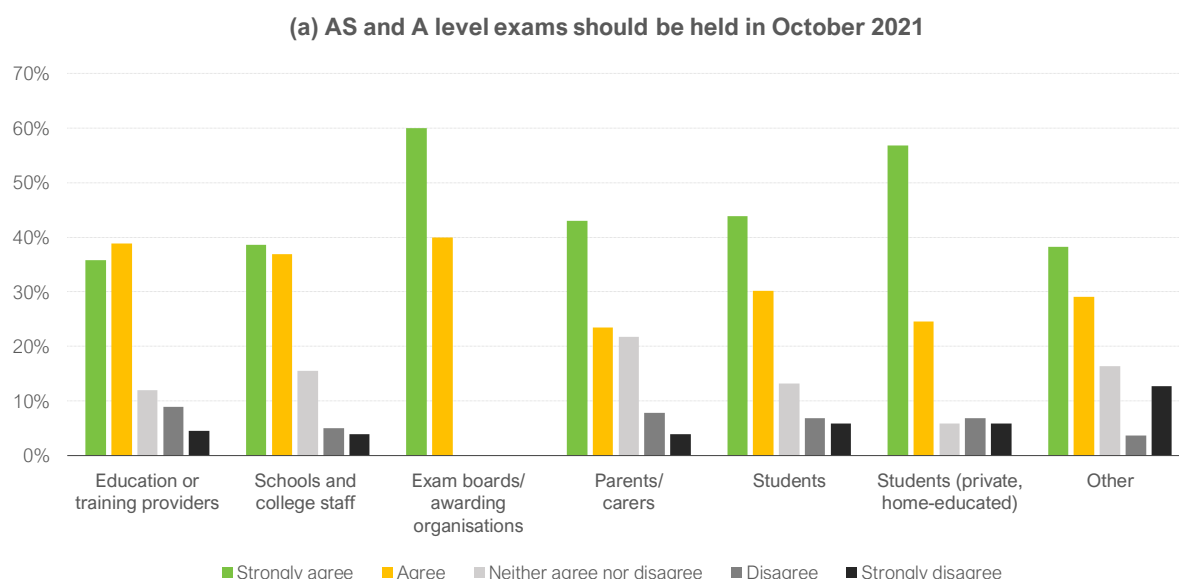
“Assuring parity and usual accessibility is paramount in ensuring credibility and comparable standards with other years exams, whether they be past or future exams. In the interests of assuring parity and such credibility, I believe that the autumn exam series should be run as in non-Covid affected years.” (Private training provider)

When the exams should be held

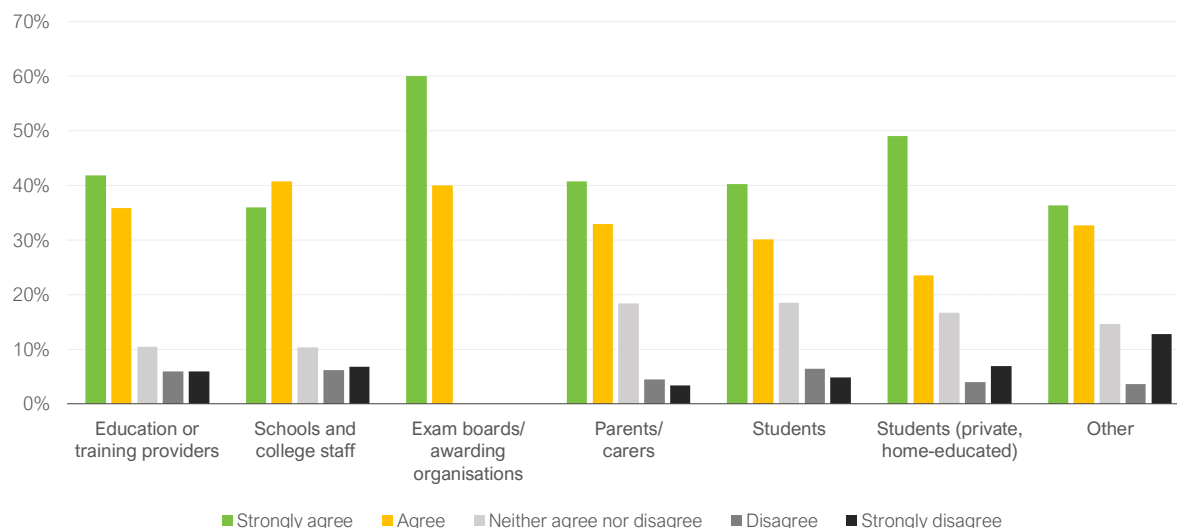
QUESTIONS COVERED IN THIS SECTION In this section of the consultation, respondents were asked to express their views on whether exam dates should be changed and exams postponed to a couple of weeks later than usual. It was proposed that AS and A level exams should be held in October and GCSE exams in November and early December. This timeline would allow students to appeal their summer 2021 result to receive the outcome of the appeal before exams start.

This section covers questions 17 and 18 in the consultation.

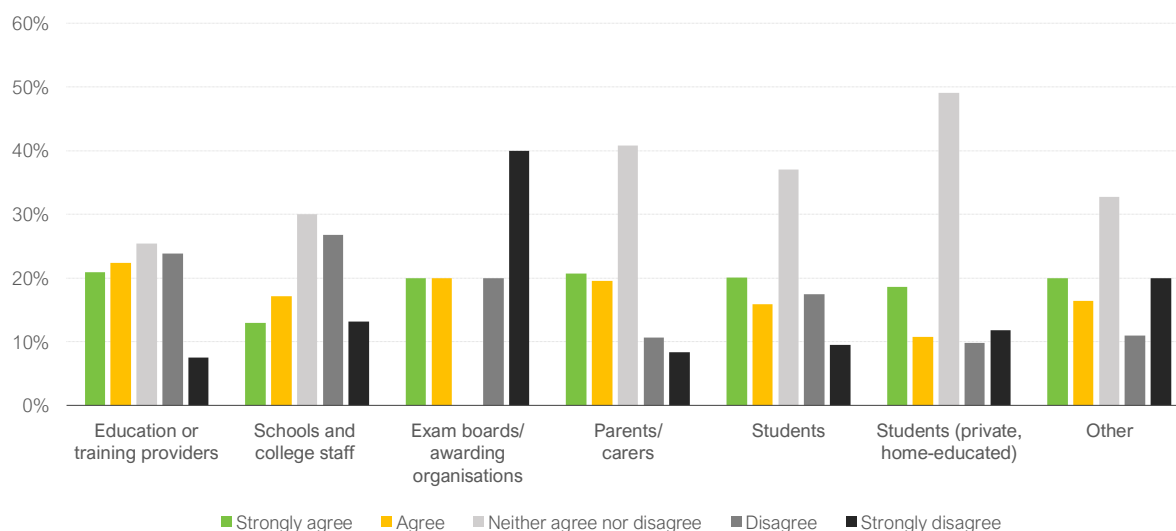
Q17. To what extent do you agree or disagree that: (a) AS and A level exams should be held in October 2021 (with entries being required by early September) (b) GCSE exams should be held in November and early December 2021 (with entries being required by early October) (c) GCSE English language and maths exams should be held later than usual?



Over two-thirds of respondents across all respondent types agreed that AS and A level exams should be held in October 2021, with entries required by early September. All exam board respondents supported the proposal, with strongest support found among schools and college staff (76% of respondents agreeing or strongly agreeing) and private or home-educated students (82% of respondents agreeing or strongly agreeing). Fewer than 20% of respondents across all respondent types disagreed with the proposal, while 22% of parents neither agreed nor disagreed with the proposal, the highest proportion across all respondent types.

(b) GCSE exams should be held in November and early December 2021

The majority of respondents agreed or strongly agreed that GCSE exams should be held in November and early December, with entries required by early October. Support was strongest among education or training providers (78% of respondents agreeing or strongly agreeing), exam boards and awarding organisations (all respondents agreeing), and schools and college staff (77% agreeing or strongly agreeing). Between 10% and 20% of respondents across all respondent types stated they neither agreed nor disagreed with the proposal, while other respondents had the highest proportion of respondents disagreeing or strongly disagreeing (17%).

(c) GCSE English language and maths exams should be held later than usual

Respondents expressed mixed feelings about GCSE English language and maths exams being held later than usual. A significant proportion of respondents (ranging from 25% for education and training providers to 50% for private or home-educated students) stated they neither agreed nor disagreed with the proposal. Support was strongest among education or training providers (43% agreeing or strongly agreeing) and weakest among private or home-educated students (30% agreeing or strongly agreeing).



agreeing). On the other hand, most exam boards (60%) disagreed or strongly disagreed with the proposal, along with 40% of schools and college staff. Among all respondent types, parents presented the lowest proportion of respondents who disagreed or strongly disagreed (19% of respondents).

Q18. Do you have any comments on our proposals for when exams should take place?

Two hundred and sixty-five respondents answered this question. This section highlights the key points that emerged from respondents' answers.

Several respondents favoured an earlier date for GCSEs and A Levels, although relatively few respondents specified a precise range of dates. These respondents pointed out that earlier exam dates would allow students to concentrate on their new courses of studies, allow grades to be received in advance of university application deadlines, or prevent delays in changes/advances in course levels.

"A level examinations should be held as early as possible in order to facilitate the transition to university for candidates making early applications in the autumn (e.g., Oxbridge, medicine, veterinary science)."
(Student)

"Exams should take place as early as possible. Maths and English being delayed is not a good idea, holding up opportunities for young people." (Parent or carer)

On the other hand, a majority of respondents favoured later dates for exams, with many specifying November or December for GCSEs and A levels. One specific issue with exam entries in September was that many exams officers only worked term-time, forcing them to work through summer holidays in August to prevent delays in exams administration. Respondents who were in favour of later exam dates supported that students would have additional time to prepare or settle into their current courses, and staff would have sufficient time to identify students who should sit for exams. Some respondents favoured late November/early December to avoid students from forgetting material over half-term, but exams could not be held too late as some schools would close early for the Christmas holidays.

"An entry deadline of early September does not give much time for schools and colleges, which may not open until the second week of September." (Exams officer or manager)

"A Levels should be taken as late as possible in the autumn term to give A level students time to gear up again with their revision but so as to allow results to be awarded before Christmas." (Parent or carer)

"Students have missed so much teaching and learning so the later English and maths exams take place the fairer it will be for them in terms of increasing their grade." (School and college staff)

Some respondents specified October would strike the appropriate balance between ample preparation time for students while still meeting application deadlines for higher education courses.

"All A Level and GCSE exams should take place in October as students have had ample time to prepare in the Summer and still received a month of revision teaching prior to examination." (School or college)

"A level exams should take place in October; this allows for entry to degree and higher education courses to be considered properly as grades will be known before January which is the normal deadline for these courses." (Student – private, home-educated of any age)

Most respondents focused on either A Levels or GCSEs (English or maths GCSEs, in particular) in their response. Respondents who cited both supported the idea of holding both exams at similar times and considering the two together in any policy proposal around exam timing.

"A normal summer exam A Level and GCSE exams are on the same days so Autumn should be the same." (School or college)

"A levels should be later, in line with GCSE, otherwise it is too difficult to administer so close to the start of term." (Exams officer or manager)

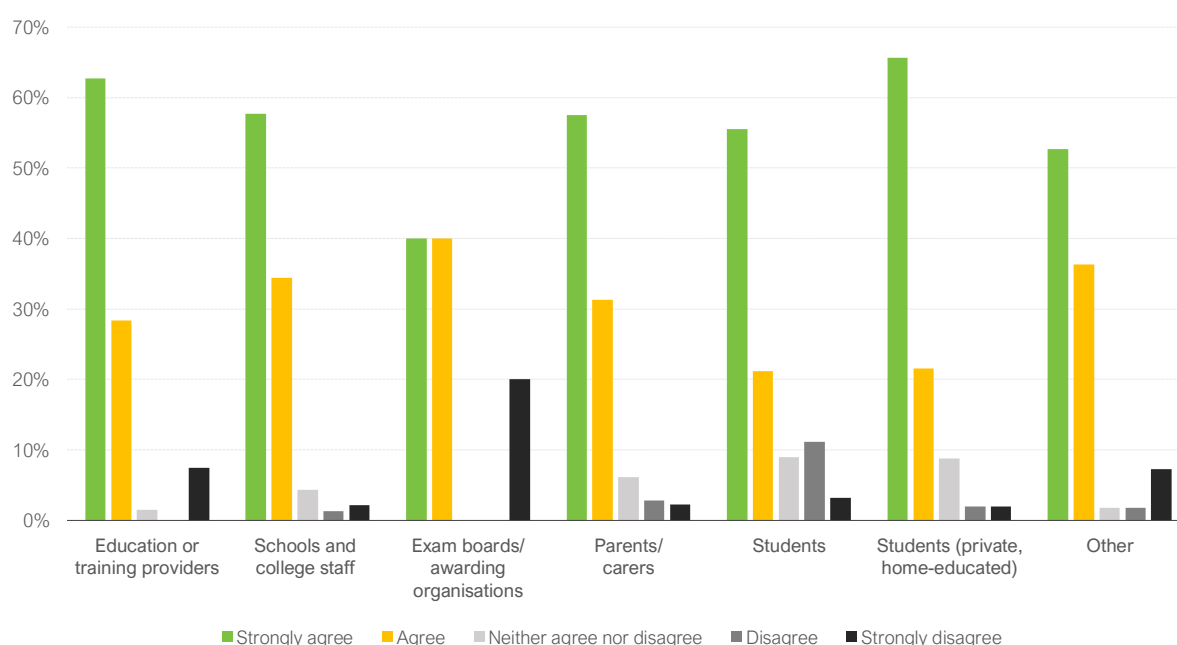


Reviews of marking and appeals

QUESTIONS COVERED IN THIS SECTION It was proposed that the usual [reviews of marking and appeals arrangements](#) normally applied to exam series should also apply in autumn 2021. In this section, respondents were asked to what extent they agreed or disagreed with the proposal and whether they had any further comment on the proposal.

This section covers questions 19 and 20 in the consultation.

Q19. To what extent do you agree or disagree that the usual arrangements for reviews of marking and appeals should apply to the autumn 2021 exam series?



The majority of respondents agreed or strongly agreed that the usual arrangements for reviews of marking and appeals should apply to the autumn 2021 exam series. This was consistent across respondent type. More than 70% of respondents across all categories either agreed or strongly agreed with the proposal.

Q20. Do you have any comments on our proposal that the usual provisions for reviews of marking and appeals should apply in autumn 2021?

Ninety-six respondents answered this question. The key themes provided by the respondents are presented below.

Respondents' views were generally split into three groups. One group of respondents called for the usual appeals process to apply with no modifications due to the impacts of COVID-19. These respondents focused on fairness to students as a reason to keep the usual system. Several further argued that fewer students participating in the autumn series should generally lead to increased accuracy of assessment and a less onerous process overall.

"It would be unfair to remove normal procedures from candidates just because the exam series is running later than usual." (Parent or carer)

"As an exam will be taken, then it is only fair that the usual appeals process applies." (Governor)

Another group of respondents stated that the appeals process should take into consideration the impacts of COVID-19. Some suggested modifications favoured students (e.g. more lenient marking or taking wider evidence into account, making the appeals process free for low-income families, a timelier process to ensure grades could support future progression). Other suggestions favoured administrative staff (e.g. shorter windows for appeals).

"Considering the impact of the pandemic on students, marking should be more lenient. The gap in learning cannot be filled easily by October/November, if the autumn series exams are then." (Student)

"Please could the review period have a shorter than normal window for the appeal. The administration of it should not hang over into the administration time for entries for the forthcoming summer 2022 exam season." (Exams officer or manager)

"Marking should be more lenient and grades should be distributed better due to how hard it's been for students to prepare in this current situation. Grade boundaries should be lower." (Student – private, home-educated of any age)

Finally, a small minority of respondents said that exam grades should be accepted with no option to appeal as students would already have had two opportunities to prove their ability or that no exams should be provided as part of the autumn series at all.

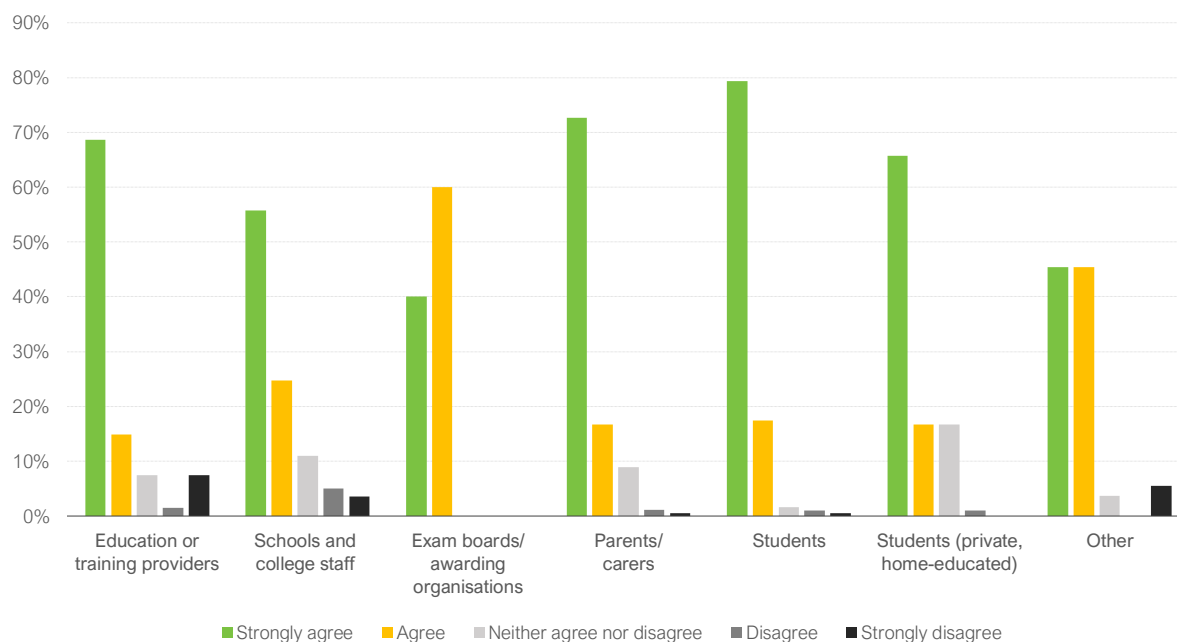
"If the candidate does not achieve the grade they were hoping for in an Autumn Exam Series, they will already have '2' Grades for that subject and so should not be able to apply for an Appeal. If they were not happy with their Teacher Assessed Grade from summer 2021, they will probably have already appealed that Grade and taken the exam as a last resort. The Awarding Body will have reviewed the sample of evidence provided for the candidate from the school in any Appeal from Summer 2021 and have made the decision that the grade was accurate." (Exams officer or manager)

Certificates

QUESTIONS COVERED IN THIS SECTION This section focuses on whether students should be provided with a certificate that shows the better of the grades provided to students in summer and autumn 2021. Ofqual suggested that exam boards should provide students, upon request, with a certificate that shows an improved grade from summer 2021 to autumn 2021. Students who have a higher grade in summer than autumn 2021 should retain the summer 2021 certificate.

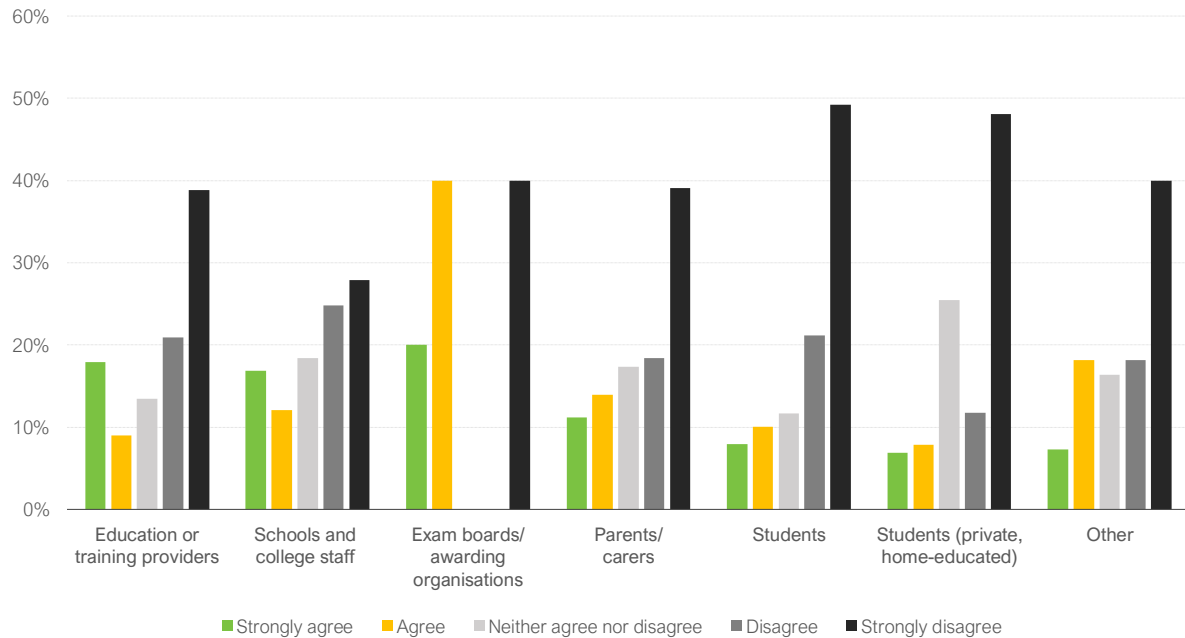
This section covers questions 21 and 22 in the consultation.

Q21. To what extent do you agree or disagree that an exam board must, at the request of a student, reissue a certificate to show the better of the grades issued to a student in summer 2021 and autumn 2021?



The majority of respondents agreed or strongly agreed that an exam board must, at the request of a student, reissue a certificate to show the better of the grades issued to a student in summer 2021 and autumn 2021. This was consistent across all respondent types. The two groups that mostly agreed with the proposal were exam boards or awarding organisations and students. None of the exam boards or awarding organisations and a small proportion of students (2%) participating in the consultation disagreed with the proposal.

Q22. To what extent do you agree or disagree that an exam board should not reissue a certificate to show the better of the grades issued in summer 2020 and autumn 2021?



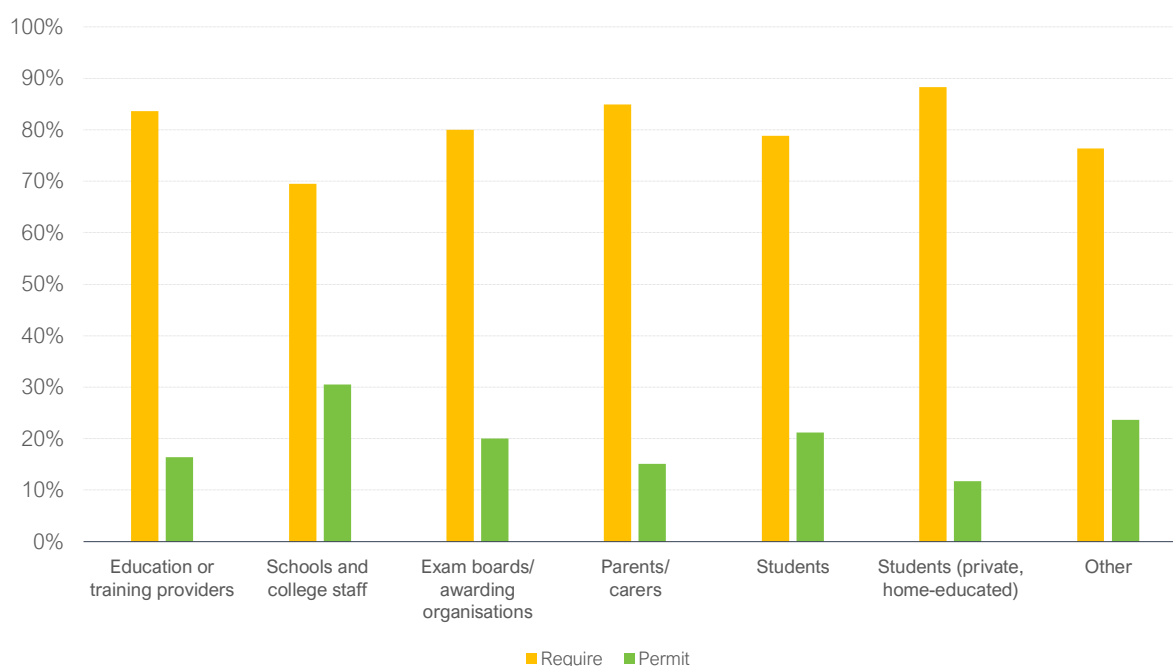
The majority of respondents disagreed or strongly disagreed with the proposal that an exam board should not reissue a certificate to show the better of the grades issued in summer 2020 and autumn 2021 across almost all categories, with the remaining respondents mostly evenly spread across the other categories of response. The only exceptions were exam boards and awarding organisations, who were evenly split between those who agreed with the proposal (40%) and those who strongly disagreed (40%). The remaining 20% strongly agreed with the proposal.

Regulatory requirements

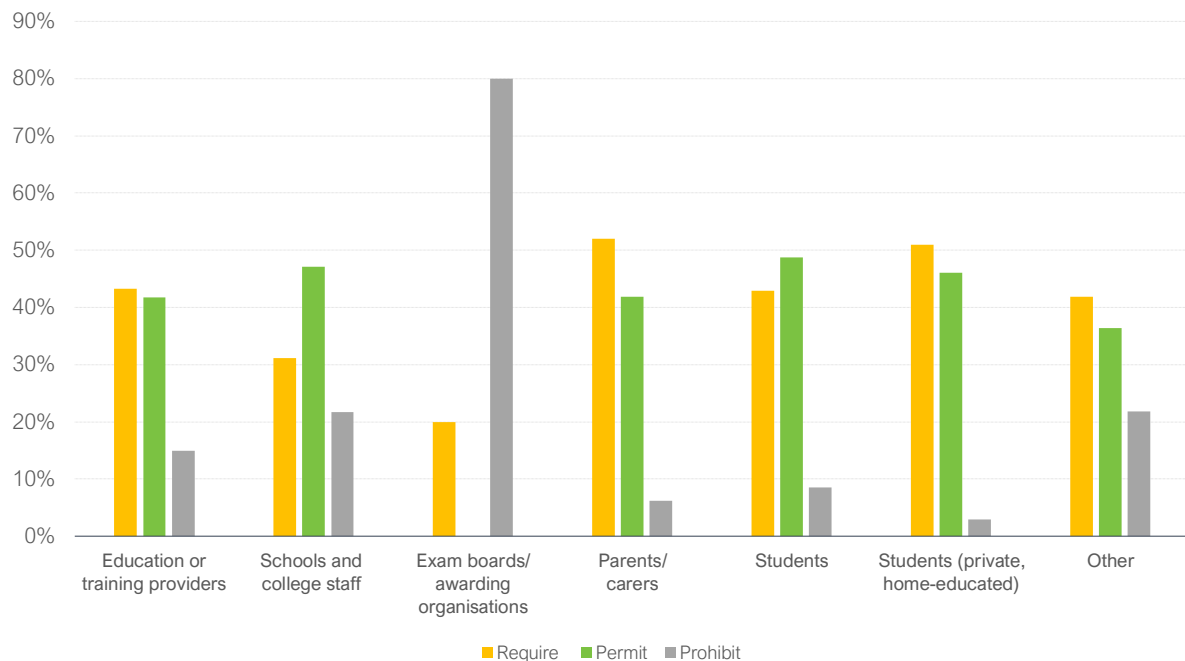
QUESTIONS COVERED IN THIS SECTION This section of the consultation focuses on the changes to the rules that will need to be introduced to allow exam boards to offer exams in autumn, as the normal rules prohibit the exam boards from offering GCSEs, AS, and A level exams in the autumn, with the exception of exams in GCSE English language and maths. The consultation collected respondents' views on the proposal that Ofqual should require exam boards to offer GCSE and A level exams. Respondents were also asked to share their opinions on whether Ofqual should require, permit, or prohibit exam boards to offer AS exams.

This section covers questions 23 to 28 in the consultation.

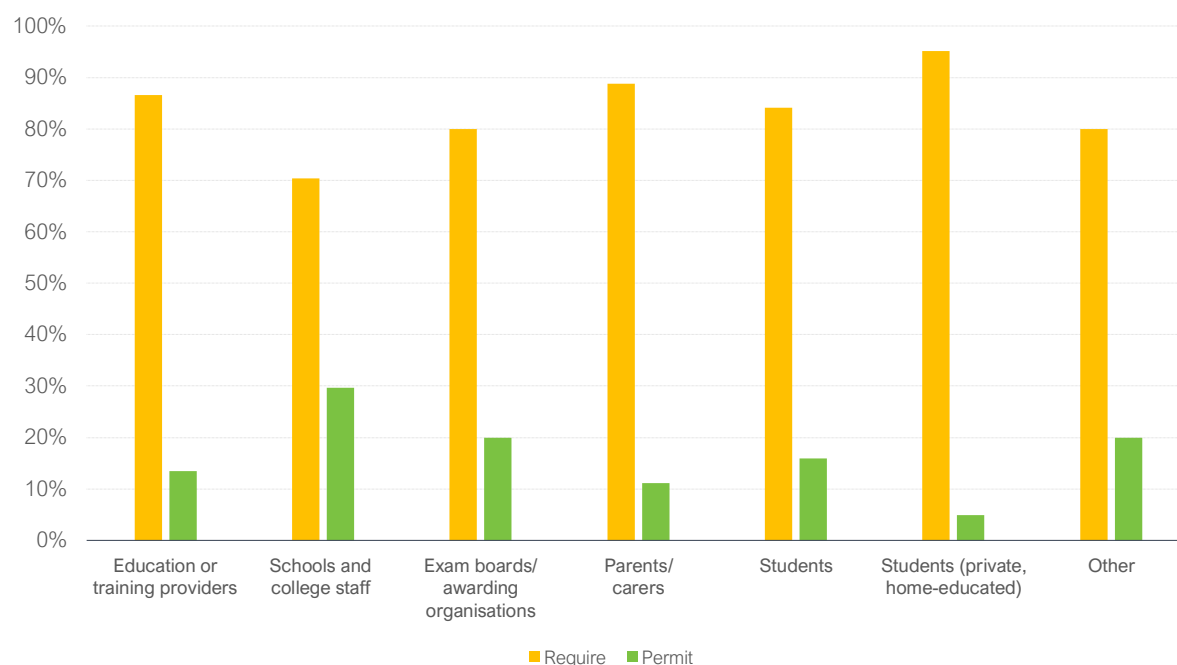
Q23. Should we require or permit the exam boards to offer GCSE exams in autumn 2021?



The majority of respondents across all respondent types (more than 70%) answered that exam boards should be required to offer GCSE exams in autumn 2021, while a minority of respondents believed that exam boards should be permitted to offer GCSE exams in autumn 2021.

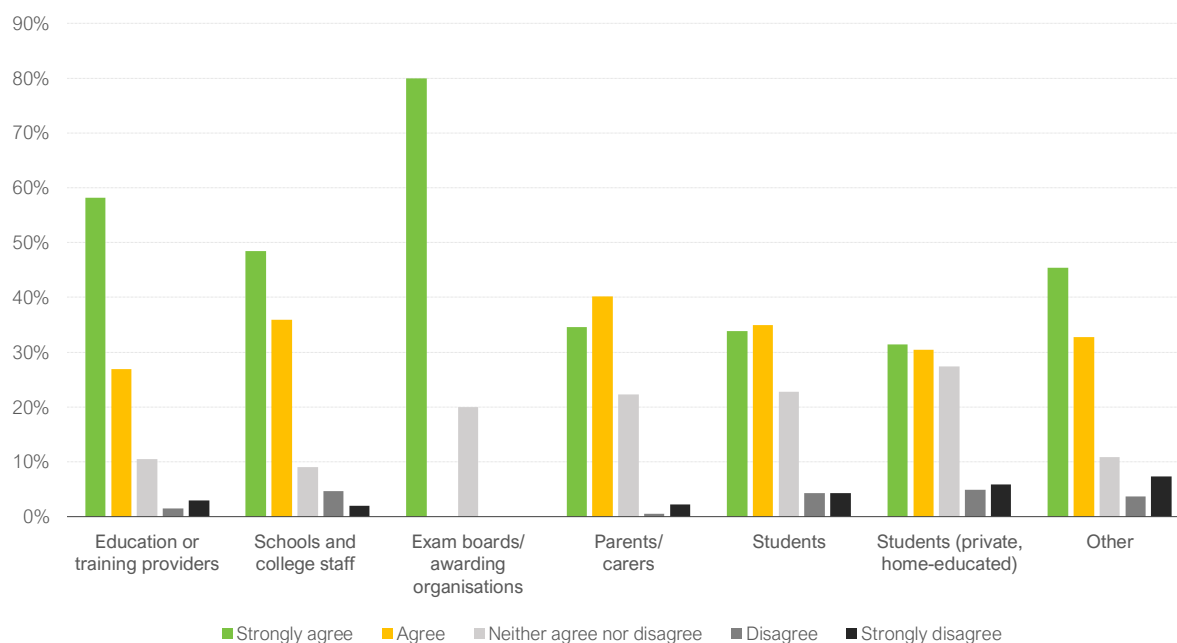
Q24. Should we require or permit the exam boards to offer AS exams in autumn 2021 or should we prohibit them from offering AS exams?

Among exam boards and awarding organisations, the majority of respondents (80%) answered that exam boards should be prohibited to offer AS exams in autumn 2021, while 20% responded that Ofqual should require exam boards to offer AS exams. Among parents and students, respondents were evenly split between those responding that Ofqual should require exam boards to offer AS exams and those responding that Ofqual should permit exam boards to offer AS exams. Only a small proportion (less than 10%) believed that Ofqual should prohibit exam boards from offering AS exams. Across the other groups (education or training providers, schools and college staff, and other), a minority of respondents answered that exam boards should be prohibited from offering AS exams.

Q25. Should we require or permit the exam boards to offer A level exams in autumn 2021?

The majority of respondents across all respondent types answered that exam boards should be required to offer A level exams in autumn 2021. The remaining respondents believed that exam boards should be permitted to offer A level exams in autumn 2021. Students (private, home-educated) were those more in favour of requiring exam boards to offer A level exams (95%) rather than permitting them to do so.

Q26. To what extent do you agree or disagree that, if we require exam boards to offer exams, we should lift this requirement for any subject for which there have been no entries by the entry deadline?



The majority of respondents across all categories agreed or strongly agreed that if exam boards are required to offer exams, Ofqual should lift this requirement for any subject for which there have been no entries by the entry deadline. Among exam boards and awarding organisations, 80% strongly agreed with the proposal, while 20% neither agreed nor disagreed. Across the other categories, only a small proportion of respondents (between 3% and 11%) disagreed or strongly disagreed with the proposal.

Q 27. Do you have comments on whether we should require or permit the exam boards to provide GCSE and A level exams in autumn 2021?

One hundred ninety-six respondents answered this question. The rest of this section presents the key points provided by the respondents.

Most respondents agreed that all exam boards should be required to provide exams. Respondents noted that A levels were especially important as they were required for progression to higher or further education, and it would be unfair if students were penalised when their exam board did not offer specific exams. Similarly, English language and maths GCSEs were also viewed as important for educational advancement and should be offered in the autumn 2021 exam series. Requiring exam boards to offer these exams would help reduce disparities between schools and create a more level playing field between students. In addition, the time required for individual exam boards to decide which exams would be offered would place additional pressure on students and leave little time to switch to another exam board. Some respondents called for additional government funding to help defray the costs of requiring a broader range of exams or excessive fees for private students.



"Definitely require, especially for A-levels as this is the age they need the grades in order to progress with their adult lives. Otherwise, it would be grossly unfair on some students if their particular exam with their particular exam board did not take place. It would be pot luck and they would miss out through no fault of their own. All students must be treated equally." (Parent or carer)

"If exams are just permitted rather than required, boards will take longer to decide what is happening in the autumn, leaving already very stressed students in limbo forever longer. The boards may well then decide not to run exams, leaving students who have studied these subjects for two years completely in the lurch." (Teacher responding in a personal capacity)

"I believe that by not making it a requirement that awarding bodies provide exams in Autumn 2021 but instead permit them to, you will create a very uneven and unfair playing field where candidates may be told you can sit Maths AQA, but not Geography OCR. In that case their only course of action would be to wait a full year until Summer 2022 where their friend who wished to sit Maths AQA and History Edexcel may be able to sit in Autumn 2021 and gain access to further education." (Exams officer or manager)

To help facilitate the provision of exams, some respondents supported allowing changes to entry after deadlines had closed (to maximise opportunities for students to sit for exams) or moving entry deadlines to substantially earlier (to allow students time to switch exam boards as needed).

"Students with no other way to get a grade, which will include most private candidates and home-schoolers, are depending on these exams going ahead in the autumn. A substantially earlier entry deadline than in a normal year would make sense, to avoid effort being wasted on exams with no candidates." (Student – private, home-educated of any age)

"Many centres make the entries on the deadline day, so to lift the requirement to enter for that subject on deadline day would in effect disadvantage pupils wanting to sit in Autumn, maybe it would be best to lift this requirement a few days after the entry deadline." (Exams officer or manager)

Respondents were more likely to be split on whether exam boards should also be required to provide all exams regardless of take-up rates. Some supported the idea of dismissing particular exam qualifications if there were no entries by the deadline or only requiring exam boards to offer popular subjects (GCSE maths, English, sciences) and permitting them to offer other subjects. These respondents discussed the financial costs of schools offering a broad range of exams. However, others noted that students would be further disadvantaged if not all subjects were offered. One example focused on students who planned to take low-entry GCSEs as part of college entry requirements, who would be unfairly penalised if exam boards could choose not to offer subjects based on take-up rates.



"If the exam has an entry, it must be required to be held, no matter how small the number of entries. To not require the exam board to hold exams that have a low number of entries is extremely unfair."

(Student)

"Exam boards should be required to offer all subjects that would have been offered in summer 2021. It is unfair on candidates who have worked hard for these exams, especially private candidates who often take low entry GCSEs as part of their requirement for college entry." (Parent or carer)

"I think as the entries are likely to be low, and there are significant costs involved in providing exams and running them within schools, the exam boards should be required to offer GCSE Maths, English and Sciences and permitted to offer other subjects. Otherwise, the Autumn season could look like a full summer season and be difficult to administer in a lot of schools." (Exams officer or manager)

Q28. Do you have comments on whether we should require or permit exam boards to provide AS exams in autumn 2021 or whether we should prohibit them from doing so?

One hundred and twenty-nine respondents answered this question. The key themes highlighted by the respondents are summarised below.

In general, fewer respondents supported requiring exam boards to provide AS exams compared to A levels or GCSEs. Respondents pointed out that AS exams are not as important as A levels or GCSEs as a requirement for future education qualifications, with AS exams only relevant if students do not progress to the full A level and have lower take-up rates. Others also noted that relatively few students improved their grade as part of the autumn series and would be better off focusing on new studies or re-sitting for English/maths.

"As AS examinations no longer carry any actual weight towards the A2 grade they are, in some cases, irrelevant." (Exams officer or manager)

"AS levels have much lower importance as they are rarely a requirement for progression." (Student)

"Last year, from the few that entered, only a small number improved their grade, asked to be withdrawn last minute or did not show up for the exam. This is because they struggled with revision, not having studied the subject for several months, and decided to focus on their new studies or English/Maths resit warranted better use of their time. I feel the situation will be worse this year, with even longer away from the classroom." (Exams officer or manager)

On the other hand, some respondents argued that requiring AS exams was an important component of a fair approach, with every student having the opportunity to take an exam in any subject. Respondents noted that some subjects had AS levels that were more popular, such as further maths, and despite low take-up rates, it was important to get more information from exam centres that offered AS exams more regularly.

"Clearly, many AS exams had very low entry figures in Autumn 2020. Look at the proportion of Autumn 2020 entries compared to June 2020 to see which would be needed. We would very much like an AS Further Maths exam since many students take just the AS in Further Maths." (Teacher responding in a personal capacity)

"AS exams have a very heavy weighing on the future of further education students. I believe it is only fair for them to have the chance to sit an autumn series in order to secure university places using fairly awarded grades." (Student – private, home-educated of any age)

In addition, some respondents said that AS exams still serve as a critical opportunity for further education and home-educated students, who have more difficulties providing predicted grades, to enter university. Students with the AS exam as the highest standard achieved in a particular subject should not be unfairly disadvantaged compared to GCSE or A level students.

"Home educated students are often reliant on AS levels in order to apply to university, as 'self-studiers' are unable to provide predicted grades. Without the AS levels to prove the standard at which the student is working, home educated students are either unable to apply to universities or are outright rejected by universities. They then have to wait another year before applying, by which time they will have their full A-levels" (Teacher responding in a personal capacity).

"For some students, AS is the highest standard they want to go in a particular subject. Not having an exam available could cause some to feel disadvantaged in comparison with GCSE and A-level students." (Examiner)

Some respondents supported AS exams for specific groups of students (such as those who leave after Year 12) instead of requiring exam boards to provide AS exams for all students.

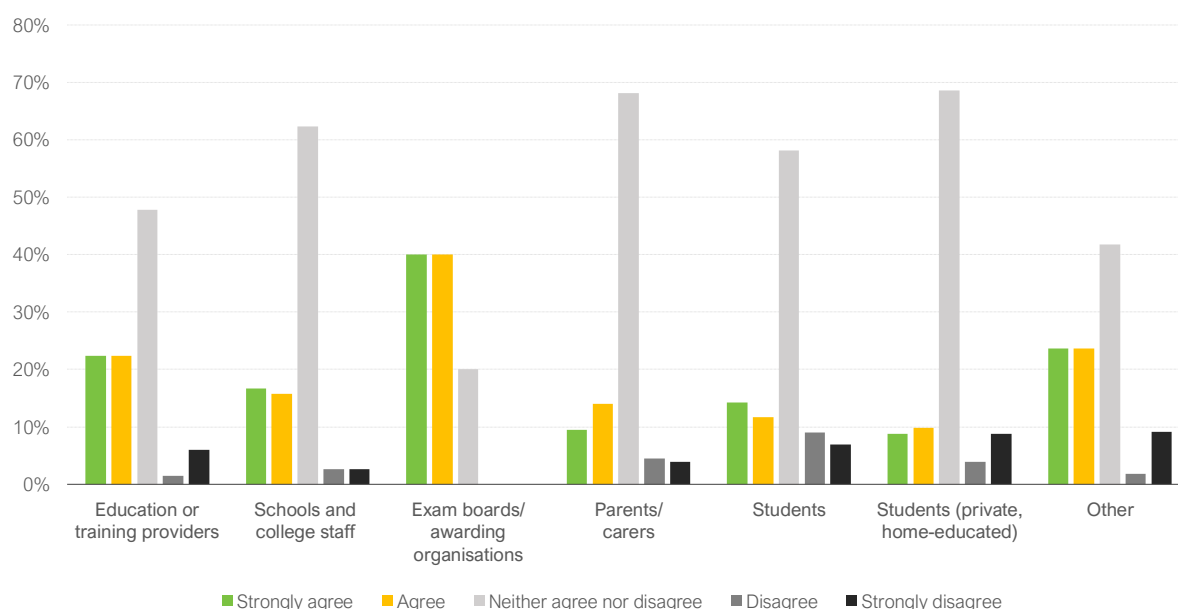
"I don't think we should require boards to provide AS levels for students who are continuing to A Level in that subject. However, for students who leave after Y12 or drop a subject an AS level is the terminal qualification, and they should have the same access in the Autumn series as A Levels. Some students will take AS Further Maths for example alongside A Level Maths, and it may help them get on a particularly popular course at university so therefore is needed for progression." (Exams officer or manager)

AEA and project qualifications

QUESTIONS COVERED IN THIS SECTION This section of the consultation focuses on the proposal that Ofqual should not set any new rules for AEA qualifications and project qualifications. Respondents were asked to provide their views on (i) whether exam boards should offer AEA exams in autumn 2021, as the current rules for AEA qualifications do not prescribe when exams should be offered, (ii) whether new rules should be introduced covering the submission of project qualifications in autumn 2021, as currently there are no regulatory restrictions on when assessments can be submitted.

This section covers questions 29 to 31 in the consultation.

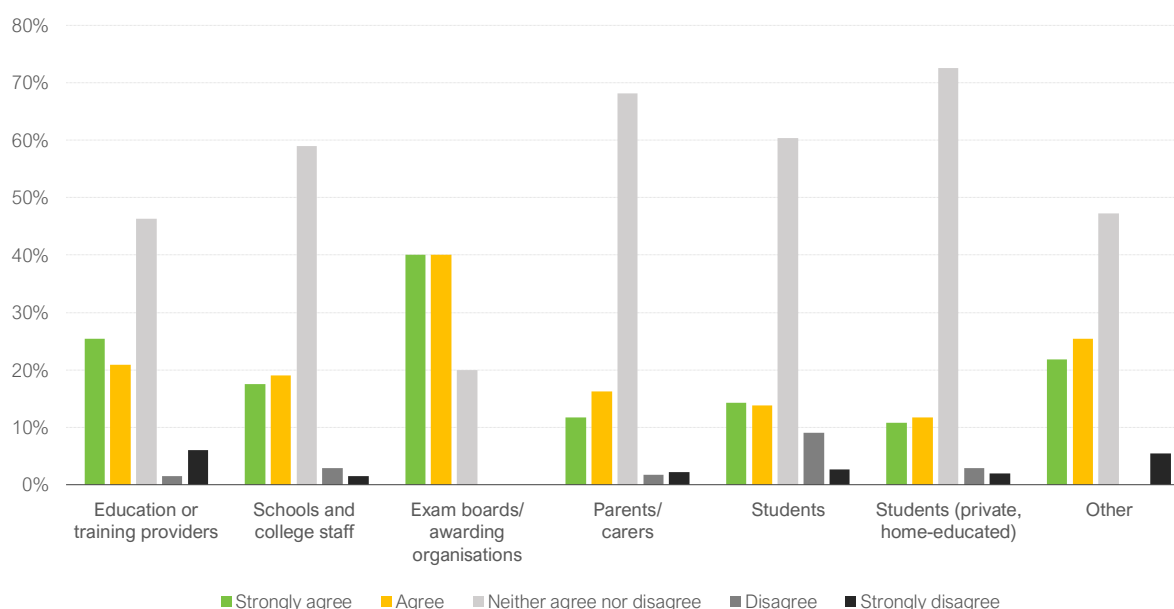
Q29. To what extent do you agree or disagree that we should not require the exam board to offer AEA exams in autumn 2021?



Among schools and college staff, parents, and students, the majority of respondents neither agreed nor disagreed that Ofqual should not require the exam board to offer AEA exams in autumn 2021. Among education or training providers, a relatively similar proportion of respondents agreed or strongly agreed (44%) or neither agreed nor disagreed (48%) with the proposal. Among exam boards and awarding organisations, 80% of respondents agreed or strongly agreed with the proposal and none disagreed. Overall, only a small proportion of respondents (between 6% and 16%, depending on the respondent type) disagreed or strongly disagreed that Ofqual should not require the exam board to offer AEA exams in autumn 2021.



Q30. To what extent do you agree or disagree that we should not introduce any rules about the submission of project qualifications in autumn 2021?



Similarly to the previous question, the majority of schools and college staff, parents, and students neither agreed nor disagreed that Ofqual should not introduce any rules about the submission of project qualifications in autumn 2021. Among education or training providers, the same proportion of respondents agreed or strongly agreed (46%) or neither agreed nor disagreed (46%) with the proposal. Among exam boards and awarding organisations, 80% of respondents agreed or strongly agreed with the proposal, while none disagreed. Overall, only a small proportion of respondents (between 4% and 12%, depending on the respondent type) disagreed or strongly disagreed with the proposal.

Q31. Do you have comments on our proposed approach to AEA and Project qualifications in autumn 2021?

A total of 28 comments were received in answer to this question. This section summarises the responses.

In their response to question 31, some of the respondents argued that the current system was appropriate, and no changes should be introduced.

"There is already a mid-year entry point which is sufficient. The planning is done around most students entering in the summer but those who need longer entering in January. Changing the mid-year entry point or adding an additional one would just confuse the situation. I think that as long as each board offering the qualification has two entry points in the year, they should stay the same." (Teacher responding in a personal capacity)

"Projects seem to be able to continue as usual with no problems." (School or college)

However, some respondents reflected that students who have worked on projects experienced major disruptions during the academic year and that this should be taken into consideration to avoid disadvantaging them.

“Students in the current academic year may/will therefore have experienced considerable disruption due to the January lockdown while completing their projects. In autumn 2021, if students were studying the EPQ in the previous academic year but did not submit and are entered in the Autumn, the exam boards should accept CAGs or TAGs or adapt the arrangements to ensure that the cohort is not compromised. They should not assume things should ‘carry on as normal’. These students will not have completed their projects in normal circumstances. If arrangements stay the same, we will not enter students in the autumn as it risks disadvantaging students.” (Senior Leadership Team).

“Students who have worked on projects during the current academic year have had their progress considerably disrupted. In most schools, they will not be given timetabled time or staff in the autumn to enable them to make good the shortfall. They should therefore be treated with greater consideration when their work is submitted in Autumn 2021.” (Examiner)

Some respondents argued that the small number of students taking the AEA should not prevent these students from being offered the opportunity to take the exams.

“All students should be given the opportunity to take exams if they wish to do so, even if the numbers are low.” (Student – private, home educated of any age).

“Smaller qualifications such as AEA and FSMQs were not offered in Autumn 2020, and this was unfair to students in these cohorts, particularly private students. Students who were unable to gain a grade in Summer 2020, unable to sit an exam in Autumn 2020, unable to find a centre to award a grade Summer 2021 would miss out again. Small overall cohorts should not be a reason to disadvantage them. Awarding bodies should only have the choice to not offer these smaller qualifications in Autumn 2021 if they do not receive any entries.” (Examiner)

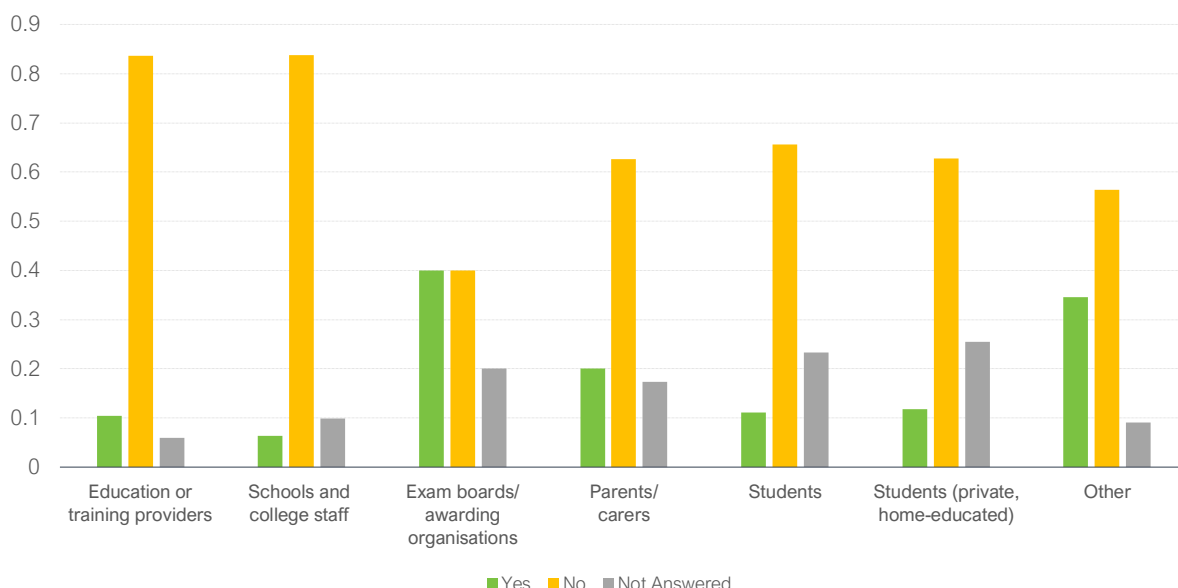
“When looking at data statistically, it’s easy to ignore the fact those “fewer than 400 students” are still students, and not being able to sit an exam can affect their life negatively.” (Student)

Equality impact assessment

QUESTIONS COVERED IN THIS SECTION *In developing the proposals included in the consultation, Ofqual considered the impact that these might have on students because of their protected characteristics. In this section of the consultation, respondents were asked whether the autumn exams arrangements might have negative consequences on students with particular protected characteristics and what these could be. Respondents were also asked to identify ways to remove or mitigate the negative impact identified, if any.*

This section covers questions 32 and 33 in the consultation.

Q32. Are there any other aspects of the possible arrangements for the autumn exams that could have a possible negative impact on students because of their protected characteristics that we have not identified? If yes, what are they?



Overall, the majority of respondents did not identify other aspects of the possible arrangements for the autumn exams not identified by Ofqual that could have a possible negative impact on students because of their protected characteristics.

One hundred and sixteen respondents provided additional comments to question 32. The key points highlighted by the respondents are discussed below.

Several respondents highlighted that the COVID-19 pandemic affected all students and each of them would face negative consequences, regardless of their characteristics and background.



"All students are at a disadvantage because of the pandemic and will continue to be when this takes off again in the autumn. At the time of writing some students continue to be out of school because of groups testing positive." (Parent or carer).

"Exams by their nature and design have a negative impact on education as a whole, and therefore adversely impact nearly all students." (Teacher responding in a personal capacity)

In particular, some respondents expressed concern that private candidates would be the most affected as they might face extra financial costs to enter exams as well as difficulties in finding an exam centre that accepts them.

"Extra financial costs for private candidates if they are required to pay for the autumn series as well as summer 2021." (Private training provider)

"If exam boards are allowed to increase their costs, this will impact significantly on private candidates unless Government funding is allowed for ALL qualifications and ALL candidates, indeed many may be forced to withdraw - something that goes against the Government policy of having a well-qualified populace." (Other)

"Private candidates are likely to be key users of the autumn exam series because many are finding it very hard to access an exam centre that is willing to work with them to obtain a grade if they have studied independently and do not have tutors." (Parent or carer)

However, some respondents identified specific groups of students who would be likely to suffer negative impacts. Some respondents, mostly parents or carers, expressed their concerns about the fact that students with disabilities, health conditions, and special needs, who are also more likely to be home-schooled, will be less able to access teacher assessed grades and therefore should be given the option to take the exams.

"Children with autism spectrum disorders are more likely to be home-schooled, which makes them less likely to be able to access teacher-assessed grades." (Student – private, home-educated of any age)

"Exams should go ahead in full and under proper exam conditions. Private candidates, many of whom are out of school for reasons relating to mental health, have been unable to access proper exams since summer 2020. Many of them have been left without grades and have been unable to progress. This is discriminatory. They should be given the option to sit the exams they have studied and prepared for without any further delay, disruption or convoluted alternatives involving getting assessments from centres that know nothing about them, how they work and their academic abilities." (Parent or carer)

"One of the barriers to private candidates entering /deferring this year has been the lack of certainty and issues with accessing exam centres. This has particularly impacted those with SEN and other disabilities who may have required AAs, and who were unable to commit to potential travel to further centres or have anxiety issues. A series open to all may help mitigate some of the damage from this summer." (Parent or carer)

Many respondents were concerned that students from less affluent socioeconomic backgrounds might not have adequate resources or live in a suitable environment to prepare for the exams. Some respondents also remarked that students from less affluent socioeconomic backgrounds have missed out on more teaching compared to more affluent students and that this might further exacerbate the gap between advantaged and disadvantaged students.

"A lot of students have struggled with home life, for example technology and noise in the home environment. If they are revising over the summer, they will have similar issues. Hence the need for more resources for students to apply for, like going into school over the summer to revise or government-funded textbooks." (Student)

"It is clear that students from lower socioeconomic backgrounds have missed out on large chunks of teaching in comparison to their more affluent peers, and to expect them to take exams on content they have not been taught will be setting them up for failure." (Other representative or interest group)

"All the usual sources of disadvantage will be in play, and also those which have resulted from COVID related issues, e.g., extensive need to self-isolate, care for an infected household member, children of healthcare workers etc. Nothing about an Autumn series will do anything other than exacerbate the disadvantage. Those particularly disadvantaged by COVID are the very people who need a fresh start and their learning time maximised, not pressure to take exams." (Governor)

"The students concerned here are the same ones who will have had differential levels of access to learning building up to the cancelled summer exam series of 2021. Therefore, this series only stands to benefit those who have had the chance to cover all the content – and those who haven't are disproportionately the more disadvantaged students. Disadvantaged students are far less likely to have covered the content necessary because of the disproportionate impact of poverty on their access to technology, their health and wellbeing, and their access to quiet space to study. This would mean that either they take the exam and enter on a playing field which is not level, or that they don't enter at all." (Other representative or interest group)

Moreover, it was also mentioned by some respondents that exam arrangements might disadvantage some students (e.g. BAME students or students with learning difficulties) if their needs are not taken into consideration.

"If the arrangements for taking community languages in mainstream schools were not clear, and teachers are unaware of the needs of the candidates and the importance of these qualifications, these students, many but not all of them who are BAME or immigrants, will be unjustly disadvantaged yet again by the exam system which ignores their needs." (Student)

"The consultation outlines potential equality impacts. Candidates who had valid access arrangements for the summer 2021 series should be able to roll those forward, even if they expired prior to the start of the autumn series. As new access arrangement for a learning difficulty might require a new assessment which may be difficult to administer in the timespan." (Awarding body or exam board)

Q33. How could any negative impacts be removed or mitigated?

One hundred and twenty-six respondents answered this question. This section highlights the key themes raised by the respondents.

Some respondents argued that in order to reduce negative impacts, extra resources should be allocated. In particular, such resources should target students, especially those in need (e.g. SEND students), to provide them with extra support.

"Highlight the potential issues with schools and suggest ways that Catch Up Funding could be used to provide young people with appropriate support." (Senior Leadership Team)

"Certain students might need to be addressed differently or given extra support." (Parent or carer)

Some respondents commented that exams should not represent a financial burden for families and should be provided at no additional cost.

"By making provision of autumn examinations at no additional cost to the student." (Student)

"Free revision guides could be made available to all students with an entry. Currently the cost of these is significant, particularly for students taking history and separate sciences at GCSE." (Exams officer or manager)

"Ofqual must ensure all exam boards are required to provide exams in all subjects in the autumn series, and exam entry and any associated costs for additional certificates must be free for all." (Other representative or interest group)

Different views were expressed by some respondents on whether announcing the content of the exams in advance would reduce inequalities among students. On one hand, respondents argued that providing such information before the exam would provide an unfair advantage to some students, especially those studying with tutors, while other respondents suggested that information about the content of the exam should be provided only to disadvantaged students. On the other hand, some respondents argued that everyone should be given a list of topics that will be included in the final exam in advance or a wider range of questions to choose from during the exam.

"Definitely don't give advanced information which would allow an unfair advantage to some." (Senior Leadership Team)

"Agreed that you don't announce content in advance, as rich people with tutors would benefit unfairly from that. But do set a wider range of question options to make things more equal for everyone - as some pupils missed much more school than others, depending on things like location in the country, illness, the need to self-isolate etc. Help them by giving them a good chance to answer on a topic they studied." (Parent or carer)

"Advance info on exams who have SEND or are identified as disadvantaged. Extra time in the exam. External support provided through tutors to support the children during August and September." (Teacher responding in a personal capacity)

"Allow all students to know the topics that will come up beforehand and also allow extra support materials in the exams to allow students to concentrate on what is most important." (Parent or carer)

"An option in mind that could help is having a choice or/and option within the exam paper, where students could leave out one of the later topics in the specification. Students could be asked to answer eight questions out of ten, for example." (Teacher responding in a personal capacity)

Some of the respondents argued that in order to reduce any negative impacts, exams should not be offered at all in autumn. Others noted that the best way to reduce any negative impacts would be to proceed with the exams to allow students to improve their grades.

"The only true way to remove the negative impacts is to not have the series at all (except the usual GCSE English Language and Maths). There will always be someone disadvantaged in some way." (Exams officer or manager)

"All students should be given an opportunity to be assessed independently of their teachers, who are often biased in their assessments of black students. Blind marking of papers provides a level playing field for many students and with fairer outcomes often seen. No more teacher assessments/grades." (Parent or carer)

"We would recommend access arrangement and reasonable adjustment from the Summer to be carried forward to reduce disruption and in line with their normal way of working." (Awarding body or exam board)

Regulatory impact assessment

QUESTIONS COVERED IN THIS SECTION This section explores whether the proposals on autumn exam arrangements might have an impact on schools, colleges, and exam boards that have not been identified in the consultation and, if so, what can be done to reduce the burden of the proposals.

This section covers questions 34 and 35 in the consultation.

Q34. We have set out our understanding of the impact of our proposals on schools, colleges and exam boards. Are there any other potential impacts that we have not identified?

One hundred and fifty-two respondents answered this question. The main themes raised by the respondents are summarised below.

Many respondents commented that the proposals did not sufficiently consider the financial implications of having an extra exam session in autumn. Several respondents were concerned that exams would imply high costs, independently of the number of candidates attending the exams.

"Impacts you have identified are clear, but my concern remains that this will fall on schools and costs will be incurred by schools additional to the normal exam costs without any funding to support." (Senior Leadership Team)

"The logistics within schools of running exams for ex-students is difficult and has associated hidden costs in the administration time, maintaining records and managing venues, as well as real costs of invigilation, entry fees, posting letters/timetables. If the school pays for the Autumn entry, and there is no cost to the students, it is likely that there will be some 'no shows' as students have settled into college places by the time the exams take place and they have mentally 'moved on' from the anxiety over summer exam grades." (Exams officer or manager)

"We believe Ofqual has, for the most part, accurately identified where the impacts in terms of costs on exam boards will be, but it cannot be underestimated how great those additional costs will be, given the likelihood that entries will be low and, therefore entry fees will not cover this cost burden. On the whole, delivery costs do not correlate directly with the number of entries for exams, as a significant proportion of our cost base is fixed. These fixed costs include, but are not limited to; content development, training and management of examiners, awarding activities, and maintenance of our qualifications." (Awarding body or exam board)

"Awarding organisations have indicated that there are flat costs involved with running an exam in any given subject that would be incurred no matter how many students entered. All of the responses here are in the context that there may be some benefit for some students to holding an autumn series. However, given the potential costs and the possibly small numbers of entries in some subjects, members are concerned that this may lead to a reduction in the rebates that would be returned from summer 2021 entry fees, in order to subsidise this autumn series." (Other representative or interest group)

Other respondents raised concerns that schools have limited physical space and would be under pressure to accommodate students during the autumn exams. A few respondents also pointed out that autumn exams would clash with the period in which mock exams are usually held, potentially affecting the preparation of the students in other cohorts.

"Schools with limited physical space would be under considerable pressure to accommodate exams alongside regular teaching of the remainder of the school/college cohort." (Senior Leadership Team)

"Some schools are concerned the vast majority of students will opt to sit the exam in the hope they will secure a better grade, in the knowledge they can rely on the centre-awarded grade if they are unsuccessful. Where this is the case, there will be several logistical issues for free schools, many of which operate from temporary sites." (Other representative or interest group)

"Some schools have a 2-week October half term which may bring difficulties with staffing and accommodation if A level exams are timetabled for those weeks." (Exams officer or manager)

A few exams officers or managers were concerned that autumn exams would require a significant additional workload for exams administrative staff.

"Additional workload for Exams admin staff of making entries for, organising and sitting an extra season will impact on these staff for a second year. Bringing forward the exam results days to be in the same week, and a week earlier than originally planned has already put more pressure on these staff, with many expecting to work the weeks after to facilitate appeals." (Exams officer or manager).

"The additional work that is put on Exams Officers to actually be able to run this exam series, when there are internal exams to organise in schools at the same time. Not all exams officers work full time." (Exams officer or manager).

Some respondents, in particular parents or carers, highlighted that more attention should be devoted to mitigating the impact of COVID-19 on students. Respondents argued that students should have priority, as they are among those who suffered the most during the pandemic. In particular, several respondents stressed that private candidates should be offered the chance to take the exam (whether in schools or other types of exam centres), and financial help should be provided to home-educating families.

"You do not appear to have considered the impact on the pupils. They have had huge challenges to face over the majority of their course. As a society, we should be offering them all the help and alternative opportunities that we can. They need to feel that we care about them and their future prospects and [that] they have not been sacrificed for the greater good." (Parent or carer)

"Impact of increased exam fees for home educating families which may result in some home educated children not being able to access GCSEs impacting upon their ability to access higher education." (Parent or carer)

"The impact that not being able to sit an exam and achieve a grade if schools/exams centres decide not to provide the exams. Many private candidates are not in school for mental health reasons. The pandemic has already had negative impacts on our children's mental health." (Parent or carer)

A few respondents expressed concerns over the fact that the current situation of uncertainty has prevented students and teachers from focusing on learning and teaching. Some students also highlighted that they feel under lots of pressure and cannot keep up with the workload. Moreover, some respondents argued that teachers feel pressured and overloaded with work as they worry about the learning process of their students.

"It has just been so much stress on us that we can't keep up with the work and have to do extra at home and revise straight after as I do at least 4 hours of work after school every day, so I need to wake up early every morning to revise." (Student)

"Most teachers are absolutely exhausted, ground down by reading instructions (all very understandable and acceptable during a period of fighting COVID) and desperate to return to focusing on learning and teaching. They are concerned about the students they are sending on to the next stage of their education who haven't been able to cover the whole subject level curriculum. They want the time to teach and for the students to learn." (Governor)

"The overload of work for teachers is a priority to consider." (Governor)

"With the likely increase in student anxiety and mental health issues, a focus on 'catch up' learning, potential continuation of self-isolation requirements etc., there is a very real risk that an extraordinary amount of pressure will be placed upon both teachers and students – particularly those sitting GCSEs alongside beginning post-16, and those sitting A levels alongside beginning post-18, studies, or work." (Other representative or interest group)

Q35. Are there any additional steps we could take to reduce the costs or burdens of our proposals?

One hundred and thirty-four respondents answered this question. This section presents the key points highlighted by these respondents.

One key concern was the fact that schools could incur additional costs due to the autumn exam series. Some respondents suggested that to cover the additional costs incurred by schools, the government should provide extra funding.

"If standard entry fees are charged for the autumn series, it is unlikely that the fees will cover the cost incurred by awarding bodies preparing the autumn series. Schools are therefore likely to see a reduction in the expected rebate of summer entry fees or an increase in summer 2022 entry fees." (School or college)"

"Last year the additional costs of running Autumn exams - COVID protocols, extra cleaning, invigilation costs, administration were substantial in my institution. A private candidate grant for centres accepting entries for Autumn 2021 would be appreciated." (Exams officer or manager)

Similarly, some students and parents were concerned about meeting the exam fees and suggested that the government should fund the autumn exams. It was also suggested that additional support should be provided to low-income families or students with special needs.

"The cost of sitting these exams should not have to be paid by the students, it is not their fault a pandemic prevented them from sitting the exam. The government should fund the autumn series." (Student)

"There exists huge poverty amongst independent learners, and many parents and families are forced into home education through a lack of care and neglect by the state school system for their children. The Covid pandemic has seen them being punished many times over for advocating in the best interests of their children's education and for them to achieve their full potential. It is a crime of the worst sort that is swept under the carpet and hidden from view." (Private training provider)

Another concern expressed by respondents, mostly exams officers or managers, was that candidates who had been entered for the autumn 2020 series did not show up to the exam in the previous year. To disincentivise this behaviour and avoid wasting resources, respondents proposed charging exam fees to candidates, with the option of refunding the fees to those candidates who attended the exam.



"Allowing centres to pass on fees to candidates or other measures to ensure that candidates who enter for the exams turn up to sit them." (Exams officer or manager)

"Make candidates pay for entries in the autumn 2021 season. Schools should then be required to refund candidates if they attend their exams. Last autumn the vast majority of the candidates didn't bother turning up for the exams even though they requested being entered for them. The wasted man-hours in administering these exams were ridiculous [...]." (Exams officer or manager)

"Schools and Colleges should be able to pass on entry fees and charges relating to invigilation and administration to those wishing to take exams. Students should be asked to pay charges and fees to be entered." (Exams officer or manager)

Some respondents suggested that one way to reduce the costs or burdens of the proposal is to provide families, students, and schools with a definitive answer about whether exams will take place or not so that students and schools can start planning. In addition, a few respondents suggested that the deadlines to enter the exams should be communicated well in advance.

"For the sake of all candidates, we would highly appreciate a definite answer. Waiting on Ofqual and the government and receiving information through news articles is extremely impactful on one's mind. It has felt like hell waiting and stressing about uncertainties and it would be highly appreciated if this time around we received a definite answer even if it does take longer to respond to us." (Student – private, home-educated of any age)

"If A level exams are to start 4th October, then please make the entry deadline Friday 10th September at the earliest to allow exams staff to get some time to collect the entry information which will be coming to them from individual 'ex' students and not in the normal teacher-led process." (Exams officer or manager)

"Widely advertise the deadline for entering for the autumn series to ensure that students contemplating making an entry are aware of the need to make an entry for the autumn with a centre in good time, especially if subjects with no entries are withdrawn soon after the entry deadline." (Exams officer or manager)

Other respondents suggested several ways to increase efficiency and reduce the costs of the autumn exams. One suggestion was to allow online exams to reduce the costs for private candidates.

"Allow online exams or teacher grading again to reduce costs to private candidates that have additional needs. Each exam would cost me £300 more to pay for laptops, invigilators and travel to my child's place of education." (Parent or carer)

"Exams could be conducted remotely if a video of the student taking the exam could be recorded. There are technical issues with a request at such an important time, but the option is there already, and most schools are already using this tech to perform day-to-day lessons." (Consultant)

Another suggestion mentioned by some exams officers or managers was to reduce the number of topics/exam papers in each examination, to conduct different exams at the same time to reduce costs (e.g. A level and GCSE), or to not offer AS exams.

"Having fewer papers per subject on a narrower, pre-announced set of topics will reduce the costs for exam boards in terms of both printing and marking." (Exams officer or manager)

"Reduce the number of papers in each examination to the bare minimum. Continue the adaptations which were made in some subjects into the Autumn series, reducing the amount of material which candidates need to cover and therefore the necessary duration of the papers." (Exams officer or manager)

"Could A Level and GCSE exams run at the same time to minimise disruption and potentially reduce the need for invigilators (obviously this would depend on numbers of candidates)?" (Exams officer or manager)

"The primary way to reduce the cost burden is to reduce the number of qualifications and subjects offered in the Autumn 2021 series. This includes, but is not limited to, making the decision not to offer AS level qualifications as part of the Autumn 2021 series." (Awarding body or exam board)

"Outside of Maths and Further Maths, AS should not be offered in the autumn." (Awarding body or exam board)

Finally, a few exams officers or managers suggested running exams in regional centres/hubs to reduce the amount of physical space needed for the exams, save resources, and avoid reducing the time devoted to existing cohorts in schools.

"I suggested last year and do so again that regional centres should be set up by exam boards to run these sessions, the waste of time and resource in schools to run six weeks of exams for 1 or 2 candidates in each session is awful when budgets are so tight, and it removes focus from existing cohorts." (Exams officer or manager)

"Rather than every school running exams for a few candidates, perhaps the idea of exam hubs could be explored so the impact of an eight-week exam series in the Autumn could be reduced. With the extra efforts taken to include private candidates in the process of teacher assessed grades, I think the number of students that are likely to want entries in Autumn 2021 will be less than Autumn 2020." (Exams officer or manager)

Appendix

Table A1. Number of respondents by type³

Respondent type	Number of respondents
Academy chain	15
Awarding body or exam board	5
Consultant	6
Examiner	11
Exams officer or manager	200
Governor	2
Local Authority	5
Parent or carer	179
Private training provider	11
Senior Leadership Manager	86
School or college	41
Student	189
Student (private, home-educated of any age)	102
Teacher (responding in a personal capacity)	170
University or higher education institution	5
Other	19
Other representative or interest group	7
Total number of respondents	1,053

³ Respondents to the consultation self-identified the group they belonged to.

Breakdown of the responses for each question⁴

Q1. To what extent do you agree or disagree that students who receive a teacher assessed grade in summer 2021 should be eligible to enter the corresponding: GCSE exams in autumn 2021; AS exams in autumn 2021; A level exams in autumn 2021?

Q1 (GCSE exams) responses	Count	Percentage
Strongly agree	783	74%
Agree	180	17%
Neither agree nor disagree	21	2%
Disagree	27	3%
Strongly disagree	42	4%
Total responses	1,053	

Q1 (AS exams) responses	Count	Percentage
Strongly agree	635	60%
Agree	164	16%
Neither agree nor disagree	144	14%
Disagree	55	5%
Strongly disagree	55	5%
Total responses	1,053	

Q1 (A level exams) responses	Count	Percentage
Strongly agree	806	77%
Agree	154	15%
Neither agree nor disagree	30	3%
Disagree	23	2%
Strongly disagree	40	4%
Total responses	1,053	

⁴ Percentages in the response tables presented in this section might not add up to 100 due to rounding.

Q2. To what extent do you agree or disagree that exam boards should be able to accept entries for the autumn exams from students who did not enter to receive a grade in summer 2021 but who, in the opinion of the exam board, would have entered for the summer 2021 exams had they taken place?

Q2 responses	Count	Percentage
Strongly agree	665	63%
Agree	220	21%
Neither agree nor disagree	68	6%
Disagree	52	5%
Strongly disagree	48	5%
Total responses	1,053	

Q3. To what extent do you agree or disagree that the autumn 2021 exams should be open to all students, regardless of any actual or planned intended entry in summer 2021? (GCSEs, AS, A level)

Q3 (GCSEs) responses	Count	Percentage
Strongly agree	469	45%
Agree	162	15%
Neither agree nor disagree	93	9%
Disagree	154	15%
Strongly disagree	175	17%
Total responses	1,053	

Q3 (AS) responses	Count	Percentage
Strongly agree	418	40%
Agree	149	14%
Neither agree nor disagree	159	15%
Disagree	149	14%
Strongly disagree	178	17%
Total responses	1,053	



Q3 (A level) responses	Count	Percentage
Strongly agree	480	46%
Agree	140	13%
Neither agree nor disagree	113	11%
Disagree	143	14%
Strongly disagree	177	17%
Total responses	1,053	

Q5. To what extent do you agree or disagree that students entering GCSE, AS or A levels in autumn 2021 should be assessed on their performance in exams only?

Q5 responses	Count	Percentage
Strongly agree	442	42%
Agree	280	27%
Neither agree nor disagree	132	13%
Disagree	100	9%
Strongly disagree	99	9%
Total responses	1,053	

Q6. To what extent do you agree or disagree that students entering GCSE, AS or A level art and design should be assessed on their performance in an exam board set task only?

Q6 responses	Count	Percentage
Strongly agree	223	21%
Agree	236	22%
Neither agree nor disagree	375	36%
Disagree	144	14%
Strongly disagree	75	7%
Total responses	1,053	

Q7. To what extent do you agree or disagree that students' work in response to the art and design tasks should be marked by the exam boards?

Q7 responses	Count	Percentage
Strongly agree	331	31%
Agree	271	26%
Neither agree nor disagree	353	34%
Disagree	63	6%
Strongly disagree	35	3%
Total responses	1,053	

Q10. To what extent do you agree or disagree that students should be able to carry forward any grade for practical science and geology skills to the autumn 2021 series?

Q10 responses	Count	Percentage
Strongly agree	573	54%
Agree	300	28%
Neither agree nor disagree	150	14%
Disagree	13	1%
Strongly disagree	17	2%
Total responses	1,053	

Q11. To what extent do you agree or disagree that students should be able to carry forward any grade for spoken language in GCSE English language and modern foreign languages?

Q11 responses	Count	Percentage
Strongly agree	564	54%
Agree	310	29%
Neither agree nor disagree	145	14%
Disagree	16	2%
Strongly disagree	18	2%
Total responses	1,053	



Q13. To what extent do you agree or disagree that the autumn exam papers should be in their normal form, in terms of: (a) the number of exams per subject (b) the style of the questions (c) the format of the papers (d) the conditions under which they are taken?

Q13 (a) responses	Count	Percentage
Strongly agree	510	48%
Agree	279	26%
Neither agree nor disagree	52	5%
Disagree	132	13%
Strongly disagree	80	8%
Total responses	1,053	

Q13 (b) responses	Count	Percentage
Strongly agree	657	62%
Agree	281	27%
Neither agree nor disagree	26	2%
Disagree	49	5%
Strongly disagree	40	4%
Total responses	1,053	

Q13 (c) responses	Count	Percentage
Strongly agree	645	61%
Agree	268	25%
Neither agree nor disagree	34	3%
Disagree	57	5%
Strongly disagree	49	5%
Total responses	1,053	



Q13 (d) responses	Count	Percentage
Strongly agree	646	61%
Agree	257	24%
Neither agree nor disagree	50	5%
Disagree	51	5%
Strongly disagree	49	5%
Total responses	1,053	

Q14. To what extent do you agree or disagree that students should not be given advance information about topics that will be included in the autumn exams?

Q14 responses	Count	Percentage
Strongly agree	371	35%
Agree	246	23%
Neither agree nor disagree	114	11%
Disagree	163	15%
Strongly disagree	159	15%
Total responses	1,053	

Q15. To what extent do you agree or disagree that students taking autumn exams should only have access to the usual support materials when taking an exam?

Q15 responses	Count	Percentage
Strongly agree	443	42%
Agree	282	27%
Neither agree nor disagree	107	10%
Disagree	124	12%
Strongly disagree	97	9%
Total responses	1,053	

Q17. To what extent do you agree or disagree that: (a) AS and A level exams should be held in October 2021 (with entries being required by early September) (b) GCSE exams should be held in November and early December 2021 (with entries being required by early October) (c) GCSE English language and maths exams should be held later than usual?

Q17 (a) responses	Count	Percentage
Strongly agree	442	42%
Agree	336	32%
Neither agree nor disagree	158	15%
Disagree	65	6%
Strongly disagree	52	5%
Total responses	1,053	

Q17 (b) responses	Count	Percentage
Strongly agree	414	39%
Agree	370	35%
Neither agree nor disagree	147	14%
Disagree	58	6%
Strongly disagree	64	6%
Total responses	1,053	

Q17 (c) responses	Count	Percentage
Strongly agree	179	17%
Agree	179	17%
Neither agree nor disagree	365	35%
Disagree	207	20%
Strongly disagree	123	12%
Total responses	1,053	

Q19. To what extent do you agree or disagree that the usual arrangements for reviews of marking and appeals should apply to the autumn 2021 exam series?

Q19 responses	Count	Percentage
Strongly agree	611	58%
Agree	316	30%
Neither agree nor disagree	59	6%
Disagree	35	3%
Strongly disagree	32	3%
Total responses	1,053	

Q21. To what extent do you agree or disagree that an exam board must, at the request of a student, reissue a certificate to show the better of the grades issued to a student in summer 2021 and autumn 2021?

Q21 responses	Count	Percentage
Strongly agree	674	64%
Agree	231	22%
Neither agree nor disagree	93	9%
Disagree	29	3%
Strongly disagree	26	2%
Total responses	1,053	



Q22. To what extent do you agree or disagree that an exam board should not reissue a certificate to show the better of the grades issued in summer 2020 and autumn 2021?

Q22 responses	Count	Percentage
Strongly agree	136	13%
Agree	125	12%
Neither agree nor disagree	181	17%
Disagree	222	21%
Strongly disagree	389	37%
Total responses	1,053	

Q23. Should we require or permit the exam boards to offer GCSE exams in autumn 2021?

Q23 responses	Count	Percentage
Require	810	77%
Permit	243	23%
Total responses	1,053	

Q24. Should we require or permit the exam boards to offer AS exams in autumn 2021 or should we prohibit them from offering AS exams?

Q24 responses	Count	Percentage
Require	421	40%
Permit	477	45%
Prohibit	155	15%
Total responses	1,053	

Q25. Should we require or permit the exam boards to offer A level exams in autumn 2021?

Q25 responses	Count	Percentage
Require	842	80%
Permit	211	20%
Total responses	1,053	

Q26. To what extent do you agree or disagree that, if we require exam boards to offer exams, we should lift this requirement for any subject for which there have been no entries by the entry deadline?

Q26 responses	Count	Percentage
Strongly agree	447	42%
Agree	369	35%
Neither agree nor disagree	166	16%
Disagree	38	4%
Strongly disagree	33	3%
Total responses	1,053	

Q29. To what extent do you agree or disagree that we should not require the exam board to offer AEA exams in autumn 2021?

Q29 responses	Count	Percentage
Strongly agree	159	15%
Agree	159	15%
Neither agree nor disagree	642	61%
Disagree	43	4%
Strongly disagree	50	5%
Total responses	1,053	

Q30. To what extent do you agree or disagree that we should not introduce any rules about the submission of project qualifications in autumn 2021?

Q30 responses	Count	Percentage
Strongly agree	170	16%
Agree	184	17%
Neither agree nor disagree	637	60%
Disagree	37	4%
Strongly disagree	25	2%
Total responses	1,053	

Q32. Are there any other aspects of the possible arrangements for the autumn exams that could have a possible negative impact on students because of their protected characteristics that we have not identified?

Q32 responses	Count	Percentage
Yes	126	12%
No	771	73%
Not Answered	156	15%
Total responses	1,053	



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