

Consultation response

Consultation on an additional GCSE, AS- and A-level exam series in autumn 2020
June 2020

i. The scope of the autumn series (pp.6-8)

- 1. To what extent do you agree or disagree that we should require exam boards to offer exams for all of the GCSE, AS and A level qualifications this autumn they had intended to offer in the summer?**

Strongly disagree

- 2. To what extent do you agree or disagree that an exam board that receives no entries for a qualification by its entry deadline can withdraw the exams for that qualification from the exam timetable?**

Strongly agree

- 3. Do you have any comments on our proposal to require the exam boards to offer exams in every GCSE, AS and A level subject in autumn 2020?**

In the context of resource and operational pressures on centres and exam boards, AQA believes the exceptional autumn 2020 resit series should prioritise those qualifications which deliver the most educational benefit and are important for progression.

For example, we note that AS-level Maths and Further Maths are often used for progression, and therefore we believe should be included. However, all other AS qualifications have low entries and over 80% are taken in Year 12. These can be resat in summer 2021 if candidates are unhappy with their result in summer 2020.

Ofqual's consultation document proposes that only qualifications with zero entries should be withdrawn. AQA believes this threshold is far too low, and would instead propose that a national entry of 100 should be set as the minimum threshold, in the context of costs to exam boards, considerable awarding challenges related to our ability to set standards in line with previous awards and the obligation to preserve savings from the summer 2020 exam series for returning to centres.

We further have concerns about offering subjects whose assessment relies heavily on NEA, such as Drama, Music and PE, in a series where no NEA will be considered for them. We detail this further below.

Due to concerns about entry numbers, pressures on centres, operational constraints for awarding organisations, the need for the qualifications for progression as the core educational benefit of an autumn series, and the unsuitability of some subjects being offered with no NEA, we would advocate a minimum entry number of 100 for all resit series. We would further advocate only offering resits in A-level subjects plus GCSE maths and English, or the EBacc qualifications.

We would advocate for an exemption for specifications being offered for the last time as a final resit opportunity.

ii. Should the form of the exam papers be the same as those normally taken in a summer exam series? (pp.8-9)

- 4. To what extent do you agree or disagree that for the autumn series the same number of exams should be taken by students as they would have taken if the summer exams had not been cancelled?**

Strongly agree

- 5. To what extent do you agree or disagree that the exams taken in the autumn series should be in the same form for each qualification as those normally taken in the summer series?**

Strongly agree

- 6. Do you have any comments on our proposal that students taking the autumn exams should take the same number of exams in each subject as they would have taken if the summer exams had not been cancelled and that the exams should be in the same form as the ones they would have taken in the summer?**

While AQA recognises that not all schools will have finished their specifications before lockdown, and will have undertaken varied levels of home learning during quarantine, the introduction of any type of 'exceptional' or 'hybrid' paper would incur significant operational and awarding challenges and risks. Furthermore, they would risk confusing teachers and students, who previously prepared for a normal exam paper, and it is likely that students would not be able to access the support of teachers in helping them navigate the changes.

To have any hope of mitigating this confusion, awarding organisations would have to amend specifications and generate new specimen papers, so teachers and students would have clarity on what to expect. This is resource-intensive and would add costs and significant risk into the process.

We would stress, while awarding risks for comparable outcomes will be considerable for low-entry subjects, risks will also exist for subjects even at the upper end of entry levels. This is due to the different experiences and make-up of those likely to enter in an autumn series.

Production of such papers at this late stage would also risk errors in following any 'hybrid rules' and in the editing of content. Given the possible low entry numbers for some subjects, it will be very difficult to set comparable standards if papers do not match the usual assessments.

We further note, however, that some exam papers which require fieldwork and practical work to have been undertaken, i.e. in geography and the sciences, may not be appropriate where candidates have not been able to do them. This is also

true of GCSE Dance, where exam papers ask students to reflect on their NEA; and of GCSE Citizenship, where they refer to their Citizenship in Action work.

iii. Should non-exam assessment be taken into account in the autumn series?
(pp.9-14)

7. To what extent do you agree or disagree that, with the exception of art and design, grades for GCSE, AS and A level awarded in the autumn should be based only on students' performance in their exams, with no non-exam assessment?

Strongly agree

8. Do you have any comments on our proposed approach to basing grades for the autumn on students' exam performance only?

Given the operational and resource challenges that will be imposed on exam boards by the delivery of the exceptional autumn resit series, we support this proposal.

However, we would require clarity on the treatment of NEA components at Awarding. For example, would Ofqual expect us to estimate the marks on NEA components from the exam performance or give a mark of zero (or absent) for all NEA components, leading to greater adjustments to written paper grade boundaries?

More widely, we recognise that in a number of other subjects, such as dance or PE, NEA provides an assessment of important practical skills in certain subject areas. As such, some stakeholders may feel that without the NEA component, the validity of the grades awarded in the exceptional autumn series may be less valid than in previous series, or indeed, the CAG-based summer 2020 grade. In this context, Ofqual may wish to consider whether these subjects are in fact included in the autumn 2020 series. For operational and centre-manageability reasons, we recognise that NEA will be too difficult to require for these subjects, if they are to be offered at all. Nevertheless, we note these inconsistencies, and associated risks to public confidence, for example, if national sporting bodies or media organisations identify that PE grades have been awarded without any participation in sporting activity contributing to the final grade. Subjects like these offered with only exams and no NEA might also be unattractive to the candidates sitting them.

We would note here that this proposal would require Ofqual to be sensitive to its own Conditions, both at a general level (e.g. D1 and comparability of assessments) and at a subject-specific level.

9. To what extent do you agree or disagree that grades for GCSE, AS and A level art and design awarded in the autumn should be based on a new task completed under supervised conditions?

Disagree

10. To what extent do you agree or disagree that any new task for GCSE, AS and A level art and design should be set and marked by the exam board?

Disagree

11. Do you have any comments on our proposed approach to the assessment of GCSE, AS and A level art and design in the autumn 2020 series?

Our preferred option would be to use existing Component 1 (the internally assessed NEA). All students will have completed or nearly completed this, so it is less likely to advantage some students over others. If there must be new work, we would strongly favour using the existing Component 2 task, rather than anything entirely new. Students will have done considerable preparation work for this, and the supervised assessment work itself could be started 'from scratch' for all students to optimise fairness.

The externally set task is usually released in February with a deadline of early May to conduct the supervised 10/15 hours. This allows essential preparation time for candidates and flexibility for centres in scheduling resources. We disagree because, if a new task is released in August, this will not allow adequate time for preparation and candidates will not be able to access the higher marks.

Assessing the Portfolio component would provide the lowest burden on centres and will remove any social disadvantage from working at home since March (as the Portfolio will generally have been completed at this point). Alternatively, if the centre burden is acceptable, the timed task set in February could be used because candidates will already have done some preparation – although the social disadvantage is more likely here if candidates have worked on this during their time at home.

iv. Separately reported results and grades (pp.14-5)

12. To what extent do you agree or disagree that exam boards should carry forward the outcome of the practical skills assessments for students who takes exams in A level biology, chemistry, physics and/or geology in the autumn?

Strongly agree

13. Do you have any comments on our proposed approach to A level biology, chemistry, physics and geology practical skills assessment outcomes for the autumn?

Certificate endorsements should not look different this series and carrying forward is the only way to achieve this without considerable burden on centres and students to complete the activities.

14. To what extent do you agree or disagree that exam boards should carry forward the outcome of the GCSE English language spoken language assessment for students who take exams in the qualification in the autumn, as in any other year?

Strongly agree

15. Do you have any comments on our proposed approach to the GCSE English language spoken language assessment outcomes for the autumn?

Certificate endorsements should not look different this series and carrying forward is the only way to achieve this without considerable burden on centres and students to complete the speaking test.

v. The timing of the autumn exam series (pp.15-7)

16. To what extent do you agree or disagree that we should put in place provisions that allow the exam boards to offer exams from October 2020, with the exact start and finish dates being confirmed by us when the position on the re-opening of schools and colleges is clearer?

Agree

17. To what extent do you agree or disagree that we should build some flexibility into our regulatory framework to enable us to vary the start and finish dates of the series if that is necessary because of the public health situation?

Agree

18. Do you have any comments on the preferred timing of the autumn exam series?

It is essential that sufficient time is allowed for entries to be processed and question papers dispatched to centres, allowing for centres to be closed in half term, before the exams begin (a minimum of four term time weeks between close of entry and exam date).

The impact of changes on the results dates should be considered, and consequently, the wider viability/desirability of an autumn series. Any changes to exam dates must be announced six weeks before the first exam date to allow AOs and schools to adjust arrangements. If cancellation is required at short notice due to another lockdown, this lead in time must be considered when rescheduling.

vi. Reviews of marking and appeals (p.18)

19. To what extent do you agree or disagree that the normal review of marking, moderation and appeal arrangements should apply to the autumn exam series?

Agree

20. Do you have any comments on our proposal that the normal reviews of marking and appeals arrangements should apply and, if needed, the normal reviews of moderation arrangements?

Usual arrangements for reviews of marking should apply. Reviews of moderation should not apply where external assessment has replaced internal assessment and moderation (e.g. as proposed for Art and Design). Anything externally assessed should be subject to a review of marking.

Any work that was used as part of the centre's grade assessment of candidate performance (e.g. any carried forward endorsements or Art and Design Portfolio work) would not be eligible for review as to do so could undermine our statistical model used to issue results this summer.

vii. Certificates (pp.18-20)

- 21. To what extent do you agree or disagree that we should amend our rules to allow an exam board to issue a replacement certificate to a student to show either their calculated grade or their grade from the autumn exam series, but not require them to do so?**

Agree

- 22. Do you have any comments on our proposal to allow exam boards to issue replacement certificates to students?**

This may encourage speculative entries from candidates who don't need to improve their grade, particularly if there is to be no additional charge for entering the autumn 2020 series. Ultimately, however, issuing replacement certificates will be the right thing to do most of the time and for most candidates, so we agree with the proposal.

viii. Project Qualifications (p.20)

- 23. To what extent do you agree or disagree that we should not impose any additional requirements on the exams boards that award the EPQs?**

Agree

- 24. Do you have any comments on our proposal that we should not impose any additional requirements on the exams boards that award the EPQs?**

The requirement to submit a brand new project for the autumn 2020 resit series will be difficult to police, when projects completed for the summer 2020 series have not been seen. It is not realistic to expect a student to complete a new project between August and October. Projects which candidates have been working on already should, therefore, count as new.

ix. The Advanced Extension Award (pp.20-1)

- 25. To what extent do you agree or disagree that we should not impose any additional requirements on the exam board that offers the Advanced Extension Award?**

Agree

- 26. Do you have any comments on our proposal that we should not impose any additional requirements on the exam board that offers the Advanced Extension Award?**

None

x. Equality Impact Assessment (pp.22-4)

27. Are there other potential equality impacts that we have not explored? What are they?

We would highlight the following for consideration by Ofqual:

- some students may be shielding at the time of the exams, or living with shielding parents, and therefore may struggle to access the exams
- disabled candidates who would normally receive extra time will still expect this, even in the context of a compressed exam timetable; further, readers and scribes may be too busy support next year's students to support this year's Year 11s and 13s in an autumn 2021 series, and the need for readers and scribes to access regional exams also needs to be considered; students with some disabilities may be disadvantaged by sitting exams in unfamiliar surroundings, if a regional exam hub model is used

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

Although not a protected characteristic, we note that socioeconomic characteristics of a student may determine:

- their ability to access the autumn series, for example, if exams are held in regional hubs
- their performance, given varying ability to access additional teaching and support to prepare for the exams, whether relating to availability of technology in the home or the resources available at a school
 - It is likely that fewer students from disadvantaged backgrounds would take advantage of the opportunity to resit; school culture plays a large role in supporting the attainment of students whose home context is not engaged with education – with that culture missing students are less likely to re-engage with exams.
 - Those students who have family support and facilities to help them study independently will have advantage over those students that don't have either facilities or family support. This too may contribute to a widening attainment gap.
 - Exam hubs would have the potential to further exclude students from less advantaged backgrounds. Disadvantaged students are less likely to countenance the idea of going to an unfamiliar place with unfamiliar people to take exams. They are also less likely to have the means to travel to somewhere not close to home.

xi. Regulatory Impact Assessment (pp.25-8)

29. Are there additional activities associated with the delivery of an additional exam series in the autumn that we have not identified above? What are they?

At a general level, we would note that the costs to exam boards of offering a full suite of GQ exams in the exceptional autumn resit series will be high, and may be considered disproportionate and a drain on resources that could be put to use for all students in other ways, i.e. by returning entry fees to schools or not needing to

spread costs for low-entry high-cost-per-entry subjects across subjects. This is particularly the case given the main educational benefit of the autumn 2020 series is limited relative to the school population as a whole: to give private candidates the opportunity to obtain a qualification in 2020 (but after the HE 2020/21 academic year has started); and, to give students applying to competitive FE and HE courses an additional resit opportunity to the following summer 2021 series.

For centres and exam boards, the autumn series will impose a range of costs, challenges and risks, and may disrupt to efforts to support current Year 10s and Year 12s who are set to miss 1.5 terms of teaching time in preparation for the summer 2021 series. Choices around the timing and scope of the autumn 2020 series will directly determine the educational benefit that is provided to other students.

We would also note that the delivery of an exceptional autumn resit series, in the context of the Covid-19 outbreak is likely to pose a number of risks and challenges to exam boards, not all of which may be clear at the current time.

For example, it is unknown whether centres will be able to recruit sufficient exam invigilators for the autumn 2020 resit series, given many are retired and may be self-isolating at the time of the resit exams. If a regional exam hub model is used and exam boards are expected to hire invigilators, this will further push up costs.

We would further note that examiners, largely consisting of teachers, may be too busy teaching to help with marking exams – causing further recruitment issues for awarding organisations.

This issue will also affect awarding, where we will be more than usually reliant on examiner judgement in a context in which those examiners are likely to be self-isolating. The cohort entering for the autumn series will be an unpredictable cohort, with an unknown expected value-added rate. In addition, while we support the exclusion of NEA in the majority of assessments, this will make the awarding process more complex than usual. The statistical predictions for the outcomes of the exams will be less reliable than in a summer or a November resit series. The awarding process will therefore be more reliant on examiner judgement to ensure we are carrying forward a comparable standard. It is likely that, because of the risks of face-to-face meetings, all awarding will take place remotely. Whilst we are confident that we could deliver this, there is a risk that the standards being agreed will not be consistent with previous years.

30. What additional costs do you expect you will incur as a result of an autumn exam series?

A number of exceptional costs can be identified.

First, exceptional assessment and awarding processes associated with the series, for example, developing methods for assessing Art and Design without visiting centres.

For the reasons outlined in response to question 29 above, it is likely that all awarding will take place remotely. This is not something AQA has ever done at

scale and will require several months of several staff members' time for system development and testing.

Second, seasonal staffing and courier costs may increase as we compete with the retail sector during the Christmas period.

Further, any question papers used in an autumn series will no longer be available for use in the summer 2021 series.

Additional costs to awarding organisations are likely to be passed on as additional costs to centres – either as a smaller amount which can be returned to them for this series, or as an increased exam entry fee for future series.

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

The costs and burden of the exceptional autumn series to exam boards will be determined by the number and range of qualifications that are offered. As such, the principal approach that would reduce the burden and cost to exam boards would be to trim the number and range of qualifications offered, for example, by setting a minimum entry number for autumn resits that must be met if resits are to be offered in that qualification.