

Consultation response

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

July 2020

Non–subject-specific questions

(Plus GCSE History and GCSE Geography questions)

i. Sampling of subject content (pp.10-2)

- 1. To what extent do you agree or disagree that centres should have a choice of topics on which their students will answer questions for GCSE history and GCSE ancient history in 2021?**

Agree

- 2. To what extent do you agree or disagree with the proposed assessment arrangements for GCSE history and GCSE ancient history exams in 2021 as set out in annex C?**

Agree

- 3. Do you have any comments on the proposal to allow centres a choice of topics on which their students will answer questions for GCSE history and GCSE ancient history exams and/or any of the proposed assessment arrangements for particular specifications in 2021?**

The proposal is an appropriate and proportionate response to the current circumstances. If adopted, it will make the History GCSE in 2021 more manageable for centres and fairer for students in the current circumstances.

The proposal would, however, cause issues from an operational perspective. For example, the different approach to optionality (that is, a choice of topics) would require a significant change to entry codes, which in itself would increase risks of incorrect entries by centres choosing wrong options. Careful thought must therefore be given to how the proposal would be put into practice in 2021.

- 4. To what extent do you agree or disagree that students taking GCSE geography exams in 2021 should not be required to undertake or be assessed on fieldwork?**

Disagree

- 5. Do you have any comments on the proposal to remove the fieldwork requirement and exam questions relating to fieldwork from GCSE geography exams in 2021?**
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Whilst we agree that students taking GCSE Geography exams in 2021 should not be required to undertake or be assessed on physical outdoor fieldwork if the ongoing public health risks make it impermissible, we value it as an important part of geography.

Fieldwork is an important feature of the qualification and, being outdoors, carries low risk. While we recognise the difficulties, we would prefer content relating to fieldwork to remain assessable in 2021. If lockdown policy makes this impermissible, virtual fieldwork can be developed and undertaken (eg including manipulation of unprocessed data sets, remote data collection eg online questionnaires etc).

ii. Question level optionality (pp.12-4)

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

Agree

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

We agree that the 2021 exams should not include more optional questions than usual, that the number of exams taken for each subject in 2021 should be the same as usual and that the exams taken in 2021 should not be longer than usual.

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

Increasing the number of optional questions also poses challenges to maintaining consistent standards and reliable marking. These challenges influenced the design of our qualifications and so simply adding more questions for students to choose from should not be a change that is introduced in isolation.

Choosing not to alter the externally-assessed written element of assessments offers a point of stability for students. We are concerned that any amendments bring consequences which cannot be fully evaluated in advance, but could damage the intentions of the proposals in the rest of the consultation. Examples of these unintended consequences include:

- Increasing the time away from teaching and learning that teachers and students would need to spend helping prepare for unfamiliar

assessments, at a time when teaching and learning time needs to be maximised.

- Increasing the size of the sample of the content domain that is assessed in the exam increases the predictability of the exam. It may follow that ‘teaching to the test’ increases, because it is possible to predict with greater certainty what will be included in the exam. This would benefit high-attaining students who familiarise themselves with the specifications, and those who have already benefitted during lockdown from access to more experienced teachers who are familiar with the specifications. Members of the AQA Student Advisory Group note that being taught only part of their A-level specification would leave them feeling less prepared for university.
- The GCSE and A-level status could be damaged, as these assessments would be seen as “easier”, and the inter-year comparability lost, meaning that stakeholders may unfairly penalise this cohort of students when competing with others to advance to the next stage of their lives.
- This risks exacerbating disparities which have widened during lockdown, where disadvantaged students from schools with fewer resources have not had access to the same technology and home-learning arrangements – it follows that for similar reasons they might also be disadvantaged in familiarising themselves with new exam formats.

iii. Changing the number and the length of exams (pp.14-5)

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

Strongly agree

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

Maintaining the same structure (including the number of exams students take in each subject) allows schools to maintain as far as is possible their planned journey through the specifications and the exam preparations they teach students. While the summer 2021 cohort must be supported, it is equally important to provide them with meaningful qualifications that reflect their efforts and do not compromise the integrity or validity of what is being assessed, and to facilitate parity with other cohorts.

Students and teachers know the structure of our assessments and it would be more work for them to understand and adapt their teaching plans to what has changed. Decreasing the number of papers would increase the perceived (and actual) importance of each paper, which would in fact increase student stress levels.

We would draw Ofqual's attention to our response to the question on increasing the number of optional questions: here too, suddenly changing the number of assessments brings risks.

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

Agree

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

This measure would have a negative impact on student well-being. Students would be disadvantaged in comparison to other cohorts by longer exams leading to accumulated tiredness over the exam period.

If access arrangements further increase the time students spend sitting exams, this would further exacerbate the problem and could lead to timetable clashes as morning sessions bleed into the afternoon.

Any amendment to assessment brings risk. We are also not convinced that simply adding more time will allow students to reach the level they might have achieved in a "normal" year. There are sufficient marks across assessments to allow us to differentiate between students of different abilities appropriately, and additional time in each exam will not enhance this.

iv. Changes to the exam timetable students (pp.15-7)

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

Strongly disagree

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

Advantages:

- A few more weeks of teaching and revision time would provide a small compensation to the months lost during lockdown
- If NEA submission deadlines remain the same, examined content can be revisited after NEA is completed

Disadvantages:

- Later exams mean a shorter marking and awarding window, with increased risks to marking accuracy
- Bottlenecks at ParcelForce and in scanning bureaus, as large subjects will be sat closer together and scripts will all be moving at once
- Delays to marking caused by processing bottlenecks and availability of senior examiners to complete standardisation and quality checking across multiple components

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- Students will object to losing a period usually used as exam leave, so disaffection and disengagement will be an issue
 - A knock-on impact in terms of teacher workload and the ability of schools to run visits and trips that are often a feature of the summer term for non-exam year groups
 - As some members of the AQA Student Advisory Group note, a shortened holiday after the exam period (often somewhat stressful, and exacerbated after one's schooling is disrupted by lockdown) could be detrimental to student mental health and wellbeing
 - A knock-on effect of results delayed and further progression to resit classes, jobs, apprenticeships, college and university
 - Implications for independent schools for whose students the end of term can be from the beginning of July. Some international students at boarding schools will already have gone home
 - No break for students during the exam period, potentially disadvantaging them in comparison to other cohorts
 - Availability of examiners during July and August, many of whom will have deferred holidays from this summer and will not have the option to cancel
 - Centres will close soon after exams end, reducing availability of staff to resolve queries about student attendance at exams, replacing corrupt media files, investigating malpractice and processing special consideration requests
 - Running over into Twelfth Fortnight in Northern Ireland
 - Increased burden on centre staff, with the potential for a higher number of centre administrative errors due to more exams taking place over a shorter period of time

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

Strongly disagree

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

Strongly disagree

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

We disagree, for many of the reasons stated in our response to changes on the GCSE timetable. Further, we would note A-level students tend to be more motivated and so are likelier to have kept up with their studies during lockdown and/or be able to catch up during the coming academic year.

We would also highlight this may cause alarm among other stakeholders (FE and HE, and what it might mean for the start dates of their academic year; and UCAS, and its turnaround of applications).

Advantages

- more teaching time
- if NEA submission deadlines remain the same, examined content can be revisited after NEA is completed

Disadvantages

- no break for students during the exam period, potentially disadvantaging them in comparison to other cohorts
- delays to marking caused by processing bottlenecks and availability of senior examiners to complete standardisation and quality checking across multiple components
- availability of examiners during July and August, many of whom will have deferred holidays from this summer and will not have the option to cancel
- centres will close soon after exams end, reducing availability of staff to resolve queries about student attendance at exams, replacing corrupt media files, investigating malpractice, processing access requirements and special consideration requests and so on
- increased burden on centre staff with potential for a higher number of administrative errors both at centres and in awarding organisations, due to more exams taking place over a shorter period of time
- assuming a later results days, it is likely to require change to HE admissions key dates, causing disruption to the sector – including clearing

Subject-specific questions

Accounting

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Ancient History

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Art and Design

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Please find below our thoughts on each proposal

100% NEA – portfolio-only

We strongly agree – this supports all students including disadvantaged students with lack of art and design materials at home.

Permit exam boards to carry out moderation by photographic or digital portfolio

We believe that moderation by photographic or digital portfolio:

- will add vast additional burden to teachers
- may require schools and colleges to purchase specialist software and/or equipment
- is not as robust, due to the complexities of Art and Design

Therefore, AQA intends to continue with visiting moderation as the default option. With social distancing being introduced and becoming the norm in many workplaces it will be straightforward to introduce, particularly given that moderators usually work on their own.

Unless visiting centres is impossible due to a strengthened or reintroduced lockdown in June 2021, moderation by photographic or digital means should only remain as a contingency, with a review of the situation in April 2021.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Please find below our thoughts on each proposal

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We strongly agree – this supports all students including disadvantaged students with lack of art and design materials at home.

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Therefore, AQA intends to continue with visiting moderation as the default option. With social distancing being introduced and becoming the norm in many workplaces it will be straightforward to introduce, particularly given that moderators usually work on their own.

Unless visiting centres is impossible due to a strengthened or reintroduced lockdown in June 2021, moderation by photographic or digital means should only remain as a contingency, with a review of the situation in April 2021.

Astronomy

v. Proposals for each GCSE subject (p.16-25)

N/A

Biblical Hebrew

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

No comment except the following clarification: Neither AQA nor Ofqual (according to the layout of their consultation) view Biblical Hebrew as falling under MFL. Any proposals made by AQA or Ofqual regarding MFL should therefore not be carried over to Biblical Hebrew.

Biology

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Neither agree nor disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Demonstrations and videos are appropriate but would need to cover more than the minimum eight or sixteen experiments.

Centres and exam boards have found, in pre-lockdown times, that the minimum of eight practical experiments each for separate sciences and sixteen for combined sciences was insufficient to cover all of the Apparatus and Techniques statements, and so in fact undertake more. Clarifying that the Apparatus and Techniques statements should still be met even with practical observations would be helpful and necessary.

Further, we note that observing an activity does not entail as much learning as undertaking an activity. We would favour observing an activity to be permissible if lockdown necessitates it, while preferring students to obtain first-hand experience where possible.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Neither agree nor disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

For AS-level, please see our concerns about how many the wording of guidance on how many practical experiments should be observed, if students have to observe teachers undertaking them, and ensuring the minimum number meets the Apparatus and Techniques statements.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

On changing the requirements for the Practical Endorsement to allow assessment of the Common Practical Assessment Criteria (CPAC) across the minimum number of practical activities required to demonstrate competence, AQA's view is that the 'minimum number of practical activities required' would have to be very carefully defined. In each specification, the 12 required practical activities have been carefully selected so as to cover all of the 12 subject-specific apparatus and techniques (AT a-l) required by each specification. Familiarity with these apparatus and techniques is often assessed via exam papers, as well as within the Practical Endorsement CPAC assessments. Coverage of ALL apparatus and techniques listed in each specification should therefore be mandatory; this is the most straightforward way to ensure this coverage would be by engaging in all 12 required practical activities.

Business

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

None.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Chemistry

v. Proposals for each GCSE subject (p.16-25)

21. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Neither agree nor disagree

22. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Demonstrations and videos are appropriate but would need to cover more than the minimum eight or sixteen experiments.

Centres and exam boards have found, in pre-lockdown times, that the minimum of eight practical experiments each for separate sciences and sixteen for combined sciences was insufficient to cover all of the Apparatus and Techniques statements, and so in fact undertake more. Clarifying that the Apparatus and Techniques statements should still be met even with practical observations would be helpful and necessary.

Further, we note that observing an activity does not entail as much learning as undertaking an activity. We would favour observing an activity to be permissible if lockdown necessitates it, while preferring students to obtain first-hand experience where possible.

vi. Proposals for each GCE AS level subject (p.26-43)

23. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Neither agree nor disagree

24. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

For AS-level, please see our concerns about how many the wording of guidance on how many practical experiments should be observed, if students have to observe teachers undertaking them, and ensuring the minimum number meets the Apparatus and Techniques statements.

vi. Proposals for each GCE A level subject (p.26-43)

21. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

22. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

On changing the requirements for the Practical Endorsement to allow assessment of the Common Practical Assessment Criteria (CPAC) across the minimum number of practical activities required to demonstrate competence, AQA's view is that the 'minimum number of practical activities required' would have to be very carefully defined. In each specification, the 12 required practical activities have been carefully selected so as to cover all of the 12 subject-specific apparatus and techniques (AT a-l) required by each specification. Familiarity with these apparatus and techniques is often assessed via exam papers, as well as within the Practical Endorsement CPAC assessments. Coverage of ALL apparatus and techniques listed in each specification should therefore be mandatory; this is the most straightforward way to ensure this coverage would be by engaging in all 12 required practical activities.

Citizenship Studies

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Strongly agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

The proposal for no changes to be made to the 100% examination arrangement for GCSE Citizenship Studies was met with strong agreement by all.

The additional requirement for exam boards to provide guidance on citizenship action in socially distanced context was also met with strong agreement by all.

There was a shared confidence that the citizenship action could be conducted whilst adhering to social distancing restrictions.

Classical Civilisation

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Classical Greek

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Combined Science

v. Proposals for each GCSE subject (p.16-25)

25. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Neither agree nor disagree

26. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Demonstrations and videos are appropriate but would need to cover more than the minimum eight or sixteen experiments.

Centres and exam boards have found, in pre-lockdown times, that the minimum of eight practical experiments each for separate sciences and sixteen for combined sciences was insufficient to cover all of the Apparatus and Techniques statements, and so in fact undertake more. Clarifying that the Apparatus and Techniques statements should still be met even with practical observations would be helpful and necessary.

Further, we note that observing an activity does not entail as much learning as undertaking an activity. We would favour observing an activity to be permissible if lockdown necessitates it, while preferring students to obtain first-hand experience where possible.

Computer Science

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

General:

- Programming Project (GCSE) and NEA (A-level): We need to be aware that with the relaxation of the supervising and authentication rules for GCSE Computer Science and at A-level where students can work unsupervised for short time periods that not all students will have had access to either the hardware and/or software to conduct their programming project/NEA during the lockdown.
- The programming project – in 2021 centres will not be required to submit work for sampling; however they are required to submit their time log and Programming Project declaration. Individual cases could be considered by each Awarding Organisation on their merit and a decision made accordingly.
- The computational and logical thinking skills developed during the programming project are used in the written examination. While each Awarding Organisation is unable to assess the impact of students not having access to hardware/software and hence the impact on an individual's performance in an exam, teachers themselves could put the necessary scaffolding in place in the time remaining prior to the exam as the relaxation of the supervising rules potentially frees some of the 20 hours of time that would have had to be set aside in the timetable for the conduct of the Programming Project.

vi. Proposals for each GCE **AS level** subject (p.26-43)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

vi. Proposals for each GCE **A level** subject (p.26-43)

23. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

24. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Please see our GCSE comments on unsupervised NEA – particularly around the disparity in access, or lack thereof, to appropriate hardware and software.

Dance

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Strongly disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

To reduce the minimum duration for all performances and choreographies

- Disagree – this could make it easier or harder to achieve marks, causing issues for comparability with previous and future series. It could also affect marking quality. See below for our alternative proposal to help ease the burden on centres, teachers and students in light of the time missed in school due to lockdown. (Further, Ofqual needs to make it clear whether, if minimum durations are reduced, current penalties will still apply.)

To allow students the option of performing solo where currently they must perform in a group (duet/trio/quartet)

- Disagree at GCSE and A-level (but agree at AS-level), given our alternative proposal below.

To allow students to submit as assessment evidence for choreographies a 'portfolio' instead of 'complete and unedited audio-visual recordings'

- Strongly disagree – will cause (a) confusion, (b) more work for teachers, centres and students and (c) introduce a significant element of subjectivity into the assessment evidence. Further, if our alternative proposal below is accepted, evidence for the choreography will have already been provided in the form of audio-visual recordings because the student will also be assessed on their performance of the choreography.

To allow exam boards to decide whether teacher assessment or moderation or direct marking by the exam board is the best approach

- Agree

Our alternative proposal will help ease the burden on teachers, students and centres in light of the time missed in school due to the pandemic:

- Remove the requirement for students to complete a duet/trio performance at GCSE and a quartet performance at A-level. Replace this with a compulsory solo performance of their choreography. Thus, as with the current AQA AS Dance qualification, the choreography would be assessed as (a) a choreography (40 marks) and (b) as a solo performance (24 marks GCSE; 20 marks A-level).
- This would reduce the demand on teachers, students and centres in light of the time missed this year due to lockdown.
- It would also remove the need for a 'portfolio' of evidence.
- All assessment objectives would still be assessed.
- At AS, the due/trio would remain but give students the option, as the consultation suggests, of doing a solo dance instead.
- This approach would allow us to maintain all current minimum durations

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

To reduce the minimum duration for all performances and choreographies

- Disagree – this could make it easier or harder to achieve marks, causing issues for comparability with previous and future series. It could also affect marking quality. See below for our alternative proposal to help ease the burden on centres, teachers and students in light of the time missed in school due to lockdown. (Further, Ofqual needs to make it clear whether, if minimum durations are reduced, current penalties will still apply.)

To allow students the option of performing solo where currently they must perform in a group (duet/trio/quartet)

- Disagree at GCSE and A-level (but agree at AS-level), given our alternative proposal below.

To allow students to submit as assessment evidence for choreographies a 'portfolio' instead of 'complete and unedited audio-visual recordings'

- Strongly disagree – will cause (a) confusion, (b) more work for teachers, centres and students and (c) introduce a significant element of subjectivity into the assessment evidence. Further, if our alternative proposal below is accepted, evidence for the choreography will have

already been provided in the form of audio-visual recordings because the student will also be assessed on their performance of the choreography.

To allow exam boards to decide whether teacher assessment or moderation or direct marking by the exam board is the best approach

- Agree

Our alternative proposal will help ease the burden on teachers, students and centres in light of the time missed in school due to the pandemic:

- Remove the requirement for students to complete a duet/trio performance at GCSE and a quartet performance at A-level. Replace this with a compulsory solo performance of their choreography. Thus, as with the current AQA AS Dance qualification, the choreography would be assessed as (a) a choreography (40 marks) and (b) as a solo performance (24 marks GCSE; 20 marks A-level).
- This would reduce the demand on teachers, students and centres in light of the time missed this year due to lockdown.
- It would also remove the need for a 'portfolio' of evidence.
- All assessment objectives would still be assessed.
- At AS, the due/trio would remain but give students the option, as the consultation suggests, of doing a solo dance instead.
- This approach would allow us to maintain all current minimum durations

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

To reduce the minimum duration for all performances and choreographies

- Disagree – this could make it easier or harder to achieve marks, causing issues for comparability with previous and future series. It could also affect marking quality. See below for our alternative proposal to help ease the burden on centres, teachers and students in light of the time missed in school due to lockdown. (Further, Ofqual needs to make it clear whether, if minimum durations are reduced, current penalties will still apply.)

To allow students the option of performing solo where currently they must perform in a group (duet/trio/quartet)

-
- Disagree at GCSE and A-level (but agree at AS-level), given our alternative proposal below.

To allow students to submit as assessment evidence for choreographies a 'portfolio' instead of 'complete and unedited audio-visual recordings'

- Strongly disagree – will cause (a) confusion, (b) more work for teachers, centres and students and (c) introduce a significant element of subjectivity into the assessment evidence. Further, if our alternative proposal below is accepted, evidence for the choreography will have already been provided in the form of audio-visual recordings because the student will also be assessed on their performance of the choreography.

To allow exam boards to decide whether teacher assessment or moderation or direct marking by the exam board is the best approach

- Agree

Our alternative proposal will help ease the burden on teachers, students and centres in light of the time missed in school due to the pandemic:

- Remove the requirement for students to complete a duet/trio performance at GCSE and a quartet performance at A-level. Replace this with a compulsory solo performance of their choreography. Thus, as with the current AQA AS Dance qualification, the choreography would be assessed as (a) a choreography (40 marks) and (b) as a solo performance (24 marks GCSE; 20 marks A-level).
- This would reduce the demand on teachers, students and centres in light of the time missed this year due to lockdown.
- It would also remove the need for a 'portfolio' of evidence.
- All assessment objectives would still be assessed.
- At AS, the due/trio would remain but give students the option, as the consultation suggests, of doing a solo dance instead.
- This approach would allow us to maintain all current minimum durations

Design Technology

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Neither agree or disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

AQA urgently requires further clarity on how mock-ups will differ from prototypes as currently expected. We also require clarity on how ‘clear/detailed intentions of prototypes’ will differ from those designs currently expected in 4.4.4.4 Section D: Developing design ideas (GCSE Design and Technology) or 4.5.3 Section C: Development of design proposals (AS and A-level Design and Technology).

Further clarification is also needed on whether the use of mock-ups and/or clear/detailed intentions of prototypes in lieu of prototypes is intended to be by exception or as a matter of course. The former would have practical implications (ie how exceptions would be managed; how to standardise marking across portfolios with prototypes and those without) and could generate an imbalance in outcomes based on centres’ ability to supervise students under public health constraints. The latter raises questions with regard to the integrity of the specifications and how assessment criteria can be met – these are expanded upon below.

There is some concern regarding how students can be expected to access marks for certain assessment criteria if they do not produce a final prototype – specifically:

- GCSE Design and Technology: 4.4.4.5 Section E: Realising design ideas (20 marks) and some of the marks for 4.4.4.6 Section F: Analysing and evaluating (20 marks).
- AS and A-level: 4.5.4 Section D: Development of design prototypes (20 marks for AS; 25 marks for A-level) and some of the marks for 4.5.5 Section E: Analysing and evaluating (16 marks for AS; 20 marks for A-level).

Overall, it is felt that by ‘allow[ing] students to watch teachers demonstrate the use of machinery rather than to use the machinery themselves’ and students producing ‘clear/detailed intentions of prototypes’ in lieu of prototypes, this proposal could result in students not completing any practical work throughout their design and technology course.

This does not feel appropriate for a course to which the practical application of knowledge is integral.

This will also have a knock-on effect with regard to progression in Design and Technology as students progressing from GCSE to A-level or from A-level to university and/or industry will not have the necessary skills to advance.

‘Relaxing the requirement in GCSE, AS and A level design and technology in order to allow students to watch teachers demonstrate the use of machinery rather than to use the machinery themselves (which, as this would require supervision, could be difficult under certain public health constraints) and Permit demonstration of using machinery / tools / processes’

It is unclear how we should interpret these statements. The implication is that teacher demonstration will supersede some or all making aspects of the NEA

typically carried out by students, including making their final prototype/mock-up (if one is required – see comments above).

This could lead to centres submitting practical outcomes that have been completely manufactured by the teacher or technician, with little or no input from the candidate to allow their own skills to be marked. If this were the case, teachers would be under a great deal of pressure to complete student work for them with little gain as it would be impossible to assess in terms of student skill. It is unclear how teachers will reliably assess a student's level of proficiency or ability to select the most appropriate machinery for a particular task if students are not required to demonstrate these skills themselves.

If the intention is to take making out of Design and Technology in terms of NEA assessment, then we would need to rewrite the assessment criteria with this in mind. This would not only remove the making element of the qualification (which is integral to Design and Technology) but would also have an impact on how students can evaluate their work.

It is felt that there needs to be a clear requirement for students to demonstrate their own making skills and for evidence of this to be provided to ensure that the full range of marks for NEA can be reliably awarded. This is likely to be a reduced requirement but to have no requirement would severely hinder progression in the subject and, crucially, students' enjoyment and motivation to continue with their studies. It may be that we consider reducing the number of hours and/or marks for making in NEA, as well as proceeding with 'mock-ups' (in lieu of prototypes) which could be made in any material but would demonstrate some level of skill.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

AQA urgently requires further clarity on how mock-ups will differ from prototypes as currently expected. We also require clarity on how 'clear/detailed intentions of prototypes' will differ from those designs currently expected in 4.4.4.4 Section D: Developing design ideas (GCSE Design and Technology) or 4.5.3 Section C: Development of design proposals (AS and A-level Design and Technology).

Further clarification is also needed on whether the use of mock-ups and/or clear/detailed intentions of prototypes in lieu of prototypes is intended to be by exception or as a matter of course. The former would have practical implications (ie how exceptions would be managed; how to standardise marking across portfolios with prototypes and those without) and could generate an imbalance in outcomes based on centres' ability to supervise students under public health

constraints. The latter raises questions with regard to the integrity of the specifications and how assessment criteria can be met – these are expanded upon below.

There is some concern regarding how students can be expected to access marks for certain assessment criteria if they do not produce a final prototype – specifically:

- GCSE Design and Technology: 4.4.4.5 Section E: Realising design ideas (20 marks) and some of the marks for 4.4.4.6 Section F: Analysing and evaluating (20 marks).
- AS and A-level: 4.5.4 Section D: Development of design prototypes (20 marks for AS; 25 marks for A-level) and some of the marks for 4.5.5 Section E: Analysing and evaluating (16 marks for AS; 20 marks for A-level).

Overall, it is felt that by ‘allow[ing] students to watch teachers demonstrate the use of machinery rather than to use the machinery themselves’ and students producing ‘clear/detailed intentions of prototypes’ in lieu of prototypes, this proposal could result in students not completing any practical work throughout their design and technology course.

This does not feel appropriate for a course to which the practical application of knowledge is integral.

This will also have a knock-on effect with regard to progression in Design and Technology as students progressing from GCSE to A-level or from A-level to university and/or industry will not have the necessary skills to advance.

‘Relaxing the requirement in GCSE, AS and A level design and technology in order to allow students to watch teachers demonstrate the use of machinery rather than to use the machinery themselves (which, as this would require supervision, could be difficult under certain public health constraints) and Permit demonstration of using machinery / tools / processes’

It is unclear how we should interpret these statements. The implication is that teacher demonstration will supersede some or all making aspects of the NEA typically carried out by students, including making their final prototype/mock-up (if one is required – see comments above).

This could lead to centres submitting practical outcomes that have been completely manufactured by the teacher or technician, with little or no input from the candidate to allow their own skills to be marked. If this were the case, teachers would be under a great deal of pressure to complete student work for them with little gain as it would be impossible to assess in terms of student skill. It is unclear how teachers will reliably assess a student’s level of proficiency or ability to select the most appropriate machinery for a particular task if students are not required to demonstrate these skills themselves.

If the intention is to take making out of Design and Technology in terms of NEA assessment, then we would need to rewrite the assessment criteria with this in mind. This would not only remove the making element of the qualification (which is integral to Design and Technology) but would also have an impact on how students can evaluate their work.

It is felt that there needs to be a clear requirement for students to demonstrate their own making skills and for evidence of this to be provided to ensure that the full range of marks for NEA can be reliably awarded. This is likely to be a reduced requirement but to have no requirement would severely hinder progression in the subject and, crucially, students' enjoyment and motivation to continue with their studies. It may be that we consider reducing the number of hours and/or marks for making in NEA, as well as proceeding with 'mock-ups' (in lieu of prototypes) which could be made in any material but would demonstrate some level of skill.

vi. Proposals for each GCE **A level** subject (p.26-43)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly disagree

18. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

AQA urgently requires further clarity on how mock-ups will differ from prototypes as currently expected. We also require clarity on how 'clear/detailed intentions of prototypes' will differ from those designs currently expected in 4.4.4.4 Section D: Developing design ideas (GCSE Design and Technology) or 4.5.3 Section C: Development of design proposals (AS and A-level Design and Technology).

Further clarification is also needed on whether the use of mock-ups and/or clear/detailed intentions of prototypes in lieu of prototypes is intended to be by exception or as a matter of course. The former would have practical implications (ie how exceptions would be managed; how to standardise marking across portfolios with prototypes and those without) and could generate an imbalance in outcomes based on centres' ability to supervise students under public health constraints. The latter raises questions with regard to the integrity of the specifications and how assessment criteria can be met – these are expanded upon below.

There is some concern regarding how students can be expected to access marks for certain assessment criteria if they do not produce a final prototype – specifically:

- GCSE Design and Technology: 4.4.4.5 Section E: Realising design ideas (20 marks) and some of the marks for 4.4.4.6 Section F: Analysing and evaluating (20 marks).

-
- AS and A-level: 4.5.4 Section D: Development of design prototypes (20 marks for AS; 25 marks for A-level) and some of the marks for 4.5.5 Section E: Analysing and evaluating (16 marks for AS; 20 marks for A-level).

Overall, it is felt that by 'allow[ing] students to watch teachers demonstrate the use of machinery rather than to use the machinery themselves' and students producing 'clear/detailed intentions of prototypes' in lieu of prototypes, this proposal could result in students not completing any practical work throughout their design and technology course.

This does not feel appropriate for a course to which the practical application of knowledge is integral.

This will also have a knock-on effect with regard to progression in Design and Technology as students progressing from GCSE to A-level or from A-level to university and/or industry will not have the necessary skills to advance.

'Relaxing the requirement in GCSE, AS and A level design and technology in order to allow students to watch teachers demonstrate the use of machinery rather than to use the machinery themselves (which, as this would require supervision, could be difficult under certain public health constraints) and Permit demonstration of using machinery / tools / processes'

It is unclear how we should interpret these statements. The implication is that teacher demonstration will supersede some or all making aspects of the NEA typically carried out by students, including making their final prototype/mock-up (if one is required – see comments above).

This could lead to centres submitting practical outcomes that have been completely manufactured by the teacher or technician, with little or no input from the candidate to allow their own skills to be marked. If this were the case, teachers would be under a great deal of pressure to complete student work for them with little gain as it would be impossible to assess in terms of student skill. It is unclear how teachers will reliably assess a student's level of proficiency or ability to select the most appropriate machinery for a particular task if students are not required to demonstrate these skills themselves.

If the intention is to take making out of Design and Technology in terms of NEA assessment, then we would need to rewrite the assessment criteria with this in mind. This would not only remove the making element of the qualification (which is integral to Design and Technology) but would also have an impact on how students can evaluate their work.

It is felt that there needs to be a clear requirement for students to demonstrate their own making skills and for evidence of this to be provided to ensure that the full range of marks for NEA can be reliably awarded. This is likely to be a reduced requirement but to have no requirement would severely hinder progression in the subject and, crucially, students' enjoyment and motivation to continue with their studies. It may be that we consider reducing the number of

hours and/or marks for making in NEA, as well as proceeding with 'mock-ups' (in lieu of prototypes) which could be made in any material but would demonstrate some level of skill.

Drama / Drama and Theatre

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Strongly disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Modify live performance statement, to allow this to be achieved through streamed or recorded performances.

- Disagree
- There is already a section on the form that allows teachers to indicate which students have not seen a live performance – they could simply write 'whole cohort' with 'Covid-19' as the reason without having to amend the statement.

Require exam boards to permit students to analyse and evaluate the work of others based on live theatre and / or streamed or recorded performances

- Agree
- This is already acceptable in our specification.

Reduce requirement to participate in a Devised Performance as either a performer or designer to at least 1.5 minutes (for monologue), and / or 2 minutes (for duologue or group).

- Agree
- We agree with this proposal but the maximum times in the specifications should not be removed.
- We would propose setting a maximum time for monologues.
- We would also ask for guidance on whether the current penalties would still be expected to be applied.

For the Devised Performance, permit exam boards to accept a portfolio of evidence to illustrate the intended final piece, the student's contribution to the

creation and development of ideas, and their analysis and evaluation of their own work, as appropriate to the task. Portfolio may include audiovisual recordings of complete performance / physical demonstrations of key aspects with explanation of how they inform final piece / original and non-original photographs, images, drawings or sketches with annotations to illustrate intentions for performance or design / scripts / written accounts / video diary.

- Strongly disagree
- This option will cause (a) confusion, (b) more work for teachers, centres and students and (c) introduce a significant element of subjectivity into the assessment evidence.
- There are a number of further objections to this proposal.
- The first is that if we are 'permitted to accept' work that is incomplete then there is a great risk that we will effectively have two separate cohorts: one that has completed a finished piece and one that has only completed parts of a piece. There will be no way to mark the work of students who have produced such vastly different work on the same scale which could lead to us having to mark and award two separate cohorts.
- The second objection is that we will need to re-write, at least in part, the marking criteria for the NEA. We would need to do this in time for teachers to digest it and for us to create standardisation materials. This would normally happen in the autumn term which means we would need to create materials that reflect incomplete pieces of work. We would also need to run standardisation for both types of students (those who had completed and those who hadn't).
- If this option were to be implemented then further guidance would need to be issued with regard to what is meant by 'illustrate the final piece'. If this is a rehearsal of the piece then it could be marked, in which case this could be assessed but it would lead to differences in standards between those doing a final performance and others submitting a video of a rehearsal. Additionally, if students are to submit a video of a rehearsal it is not clear how that helps with social distancing or with reducing the demands on time.
- In addition, this would be very difficult for lighting and sound designers. Articulating a sound or lighting design that cannot be seen in performance will be very challenging and marking design work that has not been realised will also present a significant challenge for teachers and moderators and examiners.

Reduce requirement to participate in a Text Based Performance as either a performer or designer to at least 1.5 minutes (for monologue), and/or 2 minutes (for duologue or group).

-
- Agree

For the Text Based Performance, require students to evidence their application of theatrical skills to realise artistic intentions, contribution to the creation and development of ideas, and analysis and evaluation of their own work, as appropriate to the task.

- Agree
- This would not represent a change to the current expectations.

Permit evidence to include either a complete and unedited audio-visual recording of the Text Based Performance and/or presentation of each discrete aspect/each student's individual contribution. For performance, permit audio-visual recording of acting performance alone without need for fully designed set / lighting / costumes.

- Agree
- We could mark all work via video evidence and there is no requirement for set, lighting or costumes in this performance.
- There are, however, some issues with this proposal:
 1. Where students have been able to access set and costumes etc, their performance is likely to be enhanced by these factors and other students will not have those additional tools which will help them access their characters in performance. This is, however, something with which our examiners are familiar.
 2. Clarification is needed around 'presentation of each discrete aspect/each student's individual contribution'. This seems to imply that editing of material would be allowed but it is likely that this will advantage and disadvantage some students depending on the editing skills present within each centre.

[Text Based Performance] For designers, permit portfolio of evidence that may include prototype of product / original photographs, drawings or annotated sketches of designs /annotated scripts / video or written account / physical demonstrations.

- Strongly disagree
- This would be very difficult for lighting and sound designers. Articulating a sound or lighting design that cannot be heard or seen in performance will be very challenging and marking design work that has not been realised will also present a significant challenge for teachers and moderators and examiners.
- Additionally, there is the potential that there would be two separate cohorts (those who did have their designs realised in performance and

those who did not) and a requirement to source materials in order to be able to standardise examiners.

Permit participation in a monologue for both the Devised Performance and Text Based Performance.

- Agree
- Our specification does not allow for a monologue to be created as part of the Devised Performance. This is because devising a monologue is a very different process from working with other practitioners to devise a group piece and we view the devising process as an important experience for students. As a result, this would be a 'new' area for teachers to deal with and 'devising' on your own is a slightly different skill that may mean some students may need additional guidance – adding to both the teachers and students' workload.
- This option is likely to be more difficult for weaker students to undertake effectively and we would need to provide exemplars of devised monologues to which access may be severely restricted in time for standardisation.
- This is likely to cause a greater burden for teachers. They should be spending time with the students discussing their source material and development ideas. If each student is to do a monologue, this is likely to take more time (as they will need to spend time with each individual student, rather than with a group).
- However, it could be a solution in terms of managing cohorts who may be experiencing local lockdowns and restrictions and we can see how this might be a benefit to some centres.

Permit both NEA components to be marked by the teacher and moderated by the exam board or marked directly by the exam board.

- Agree
- Though we do not think it would be appropriate to ask for both components to be marked by teachers as this will add to an already difficult burden.

Permit exam boards to assess 1 complete and substantial performance text and 1 key extract from a second contrasting performance text

- Agree
- We could scale up the mark for the performance of one extract.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Modify live performance statement, to allow this to be achieved through streamed or recorded performances.

- Disagree
- There is already a section on the form that allows teachers to indicate which students have not seen a live performance – they could simply write ‘whole cohort’ with ‘Covid-19’ as the reason without having to amend the statement.

Require exam boards to permit students to analyse and evaluate the work of others based on live theatre and / or streamed or recorded performances

- Agree
- This is already acceptable in our specification.

Reduce requirement to participate in a Text Based Performance as a performer, director or designer to a duration of at least 1.5 minutes (for monologue), and/or 3 minutes (for duologue or group).

- Agree
- We do not currently allow monologues in our specification. As this is already allowed by the Ofqual conditions, can we assume it would be acceptable to make such a change to the specification?
- We would need to add a maximum time for the monologues.
- We would also ask for guidance on whether the current penalties would still be expected to be applied.

For the Text Based Performance, require students to evidence their application of theatrical skills to realise artistic intentions, contribution to the creation and development of ideas, and analysis and evaluation of their own work, as appropriate to the task.

- Agree
- This would not represent a change to the current expectations.

Permit evidence to include either a complete and unedited audio-visual recording of the Text Based Performance and/or presentation of each discrete aspect/each student's individual contribution. For performance, permit audio-visual recording of acting performance alone without need for fully designed set / lighting / costumes.

- Agree
- We could mark all work via video evidence and there is no requirement for set, lighting or costumes in this performance.
- There are, however, some issues with this proposal:
 1. Where students have been able to access set and costumes etc, their performance is likely to be enhanced by these factors and other students will not have those additional tools which will help them access their characters in performance. This is, however, something with which our examiners are familiar.
 2. Clarification is needed around 'presentation of each discrete aspect/each student's individual contribution'. This seems to imply that editing of material would be allowed but it is likely that this will advantage or disadvantage some students depending on the editing skills present within each centre.
 3. There is a significant problem if students choose a practitioner whose work and methodology requires a high degree of realism, especially if they are completing a shorter piece. It would be possible to amend the marking criteria such that we are only looking for a reflection of a practitioner's style in a piece but these changes would need to be sanctioned by Ofqual.

[Text Based Performance] For directors and designers, permit portfolio of evidence that may include prototype of product(s) / original photographs, drawings or annotated sketches of designs /annotated scripts / video or written account / physical demonstrations.

- Disagree
- This would be very difficult for lighting and sound designers. Articulating a sound or lighting design that cannot be heard seen in performance will be very challenging and marking design work that has not been realised will also present a significant challenge for teachers and moderators and examiners. Whilst this might be more manageable at AS- and A- level, than at GCSE, it is still a cause for significant concern.
- Additionally, there is the potential that there would be two separate cohorts (those who did have their designs realised in performance and those who did not) and a requirement to source materials in order to be able to standardise examiners.

The NEA component may be marked by the teacher and moderated by the exam board or marked directly by the exam board.

-
- Neither agree nor disagree
 - Whilst allowing this would not mandate changes, we think that asking teachers to mark this component would be unfair considering the other demands placed on their time.

Permit exam boards to assess 1 complete and substantial performance text and 1 or more key extracts from (a) different text(s).

- Agree
- This would mean students would have less to discuss in their portfolios but marking criteria could be applied.

vi. Proposals for each GCE **A level** subject (p.26-43)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly disagree

18. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Requirement for live performance statement but permit this to be achieved through streamed or recorded performances

[Please note that this is different from the proposal wording for GCSE and AS level despite it being the same condition, hence the different responses]

- Agree
- There is already a section on the form that allows teachers to indicate which students have not seen a live performance – they could simply write ‘whole cohort’ with ‘Covid-19’ as the reason without having to amend the statement.

Require exam boards to permit students to analyse and evaluate the work of others based on live theatre and / or streamed or recorded performances

- Agree
- This is already acceptable in our specification.

Reduce requirement to participate in a Devised Performance as either a performer or designer to at least 1.5 minutes (for monologue), and / or 3 minutes (for duologue or group).

-
- Agree
 - We agree with this proposal but the maximum times in the specifications should not be removed.
 - However, if this is implemented, it could impact on students' ability to demonstrate a practitioner's intentions and methods.
 - We would propose setting a maximum time for monologues.
 - We would also ask for guidance on whether the current penalties would still be expected to be applied.

For the Devised Performance, permit exam boards to accept a portfolio of evidence to illustrate the intended final piece, the student's contribution to the creation and development of ideas, and their analysis and evaluation of their own work, as appropriate to the task. Portfolio may include audiovisual recordings of complete performance / physical demonstrations of key aspects with explanation of how they inform final piece / original and non-original photographs, images, drawings or sketches with annotations to illustrate intentions for performance or design / scripts / written accounts / video diary.

- Strongly disagree
- There are a number of objections to this proposal.
- This option will cause (a) confusion, (b) more work for teachers, centres and students and (c) introduce a significant element of subjectivity into the assessment evidence.
- The first is that if we are 'permitted to accept' work that is incomplete then there is a great risk that we will effectively have two separate cohorts. One that has completed a finished piece and one that has only completed parts of a piece. There will be no way to mark the work of students who have produced such vastly different work on the same scale which could lead to us having to mark and award two separate cohorts.
- The second objection is that we will need to re-write, at least in part, the marking criteria for the NEA. We would need to do this in time for teachers to digest it and for us to create standardisation materials. This would normally happen in the autumn term which means we would need to create materials that reflect incomplete pieces of work. We would also need to run standardisation for both types of students (those who had completed and those who hadn't).
- If this option were to be implemented then further guidance would need to be issued in regard to what is meant by 'illustrate the final piece'. If this is a rehearsal of the piece then it could be marked in which case this could be assessed but it would lead to differences in standards between

those doing a final performance and others submitting a video of a rehearsal. Additionally, if students are to submit a video of a rehearsal it is not clear how that helps with social distancing or with reducing the demands on time.

- In addition, this would be very difficult for lighting and sound designers. Articulating a sound or lighting design that cannot be heard or seen in performance will be very challenging and marking design work that has not been realised will also present a significant challenge for teachers and moderators and examiners.

Reduce requirement to participate in a Text Based Performance as either a performer or designer to at least 1.5 minutes (for monologue), and/or 3 minutes (for duologue or group).

- Agree
- There is a risk that students who opt to aim for the lower limit of 1.5 minutes may struggle to access the full range of marks in such a short time.
- We would also ask for guidance on whether the current penalties would still be expected to be applied.

For the Text Based Performance, require students to evidence their application of theatrical skills to realise artistic intentions, contribution to the creation and development of ideas, and analysis and evaluation of their own work, as appropriate to the task.

- Agree
- This would not represent a change to the current expectations.

Permit evidence to include either a complete and unedited audio-visual recording of the Text Based Performance and/or presentation of each discrete aspect/each student's individual contribution. For performance, permit audio-visual recording of acting performance alone without need for fully designed set / lighting / costumes.

- Agree
- We could mark all work via video evidence and there is no requirement for set, lighting or costumes in this performance.
- There are, however, some issues with this proposal:
 1. Where students have been able to access set and costumes etc, their performance is likely to be enhanced by these factors and other students will not have those additional tools which will help them

access their characters in performance. This is, however, something with which our examiners are familiar.

2. Clarification is needed around 'presentation of each discrete aspect/each student's individual contribution'. This seems to imply that editing of material would be allowed but it is likely that this will advantage or disadvantage some students depending on the editing skills present within each centre.

- There is a significant problem if students choose a practitioner whose work and methodology requires a high degree of realism, especially if they are completing a shorter piece. It would be possible to amend the marking criteria such that we are only looking for a reflection of a practitioner's style/move marks to another area of the marking criteria in a piece but these changes would need to be sanctioned by Ofqual. This would allow us to credit work that fulfilled its dramatic intentions whether or not those intentions are linked to fulfilling the ideas of a selected practitioner. Evidence of knowledge and understanding of the selected practitioner may still be credited, as now, in the Reflective report.

[Text Based Performance] For directors and designers, permit portfolio of evidence that may include prototype of product(s) / original photographs, drawings or annotated sketches of designs /annotated scripts / video or written account / physical demonstrations.

- Disagree
- This would be very difficult for lighting and sound designers. Articulating a sound or lighting design that cannot be heard or seen in performance will be very challenging and marking design work that has not been realised will also present a significant challenge for teachers and moderators/examiners. Whilst this might be more manageable at AS- and A-level, than at GCSE, it is still a cause for significant concern.
- Additionally, there is the potential that there would be two separate cohorts (those who did have their designs realised in performance and those who did not) and a requirement to source materials in order to be able to standardise examiners.

Permit participation in a monologue for both the Devised Performance and Text Based Performance.

- Agree
- Our specification does not allow for a monologue to be created as part of the Devised Performance. This is because devising a monologue is a very different process from working with other practitioners to devise a group piece and we view the devising process as an important experience for students. As a result, this would be a 'new' area for teachers to deal with and 'devising' on your own is a slightly different skill

that may mean some students may need additional guidance – adding to both the teachers and students' workload.

- This option is likely to be more difficult for weaker students to undertake effectively and we would need to provide exemplars of devised monologues to which access may be severely restricted in time for standardisation.
- This is likely to cause a greater burden for teachers. They should be spending time with the students discussing their source material and development ideas. If each student is to do a monologue, this is likely to take more time (as they will need to spend time with each individual student, rather than with a group).
- In addition, this poses some challenges in terms of the application of a practitioner's work/methodologies could be significantly hampered by students undertaking a monologue in the Devised Performance and there would be a need to consider the marking criteria and probably make amendments to them as written at the moment.
- However, it could be a solution in terms of managing cohorts who may be experiencing local lockdowns and restrictions and we can see how this might be a benefit to some centres.

Permit both NEA components to be marked by the teacher and moderated by the exam board or marked directly by the exam board.

- Agree
- It is unlikely this will make a difference to how we mark each component as asking teachers to mark both components would place unacceptable demands on them.

Permit exam boards to assess 2 complete and substantial performance texts and 1 or more key extracts from (a) different text(s).

- Agree
- We are concerned about cohorts of students who have already spent time on Extracts 1 and 2 and who may already have written about this work within a draft Reflective report.
- Students deserve credit for work already completed.
- Therefore, while we support the suggestion of requiring performance of only **one** extract we would recommend that – in order to maintain a level playing field – students be allowed to submit up to 3,000 words whether or not they have worked on one extract, two extracts or three extracts.

-
- The criteria would have to be amended slightly.

Economics

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

None.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Electronics

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Engineering

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

The proposed changes are possible, and all AOs can still be assessed, but significant changes to the specification/mark scheme would be required. 'Permit exam boards to accept clear/detailed intentions of prototypes' suggests the 'make' element of the NEA would be optional which introduces fairness issues and could advantage some centres by introducing incomparable routes through the specification. There is some confusion over this statement and we feel it needs more clarity as we need to ensure that this aspect of the course would therefore not be assessed. Clearly students cannot be assessed according to the teachers' demonstrations and the only way we can assess the knowledge they gain is through the examination. This is currently what is already in place for this qualification.

We feel that whether making is assessed in the qualification should be a definitive decision one way or the other to allow for standardisation across centres. This clarity would enable us to agree with the proposals.

There is mixed feeling about whether making should remain in the qualification for this exceptional year, but we can understand the difficulties in a subject where mockups and hand tools may be less appropriate.

We are disappointed to see that the inclusion of a formula sheet does not feature in the proposal. This would have been welcomed to increase the accessibility of the exam.

English Language

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Neither agree nor disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

We feel more could be done to review what is required for the spoken language assessment to reduce the assessment burden for teachers and students. We also have a concern that the proposal could be open to differing interpretations and lead to inconsistency across centres.

The proposal to drop the requirement for a recording and for the assessment to take place before a single teacher who can represent an 'audience' may alleviate a pressure to record a sample but in reality this may not free up additional time as the presentation still needs to be delivered and assessed. This could be interpreted differently across centres with some light touching this

requirement and others affording a higher proportion of teaching time – both would be within the bounds of what has been stipulated.

To create greater clarity and to deliver greater consistency between centres, we would suggest that the endorsement be entirely teacher judgement (in line with what was required for 2020) and the grade awarded be a holistic judgement based on speaking and listening opportunities as part of classroom learning (the teacher would have sources of evidence but there is not a requirement for evidence to be submitted). Within the course teachers would be able to construct presentation opportunities as part of teaching Paper 2 to support a teacher judgement using existing criteria. Other exam boards would have similar opportunities through the teaching of the non-fiction element of their papers.

Clarity about whether these proposals would also apply for NEA such as the spoken language endorsement which is taken in 2021 by the summer 2022 cohort is also desirable.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

English Literature

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

AQA believes that a gesture to support teachers and students is arguably required, for example, introducing an open book poetry element. Students revise 15 poems and draw upon one directly in the exam so to have open book poetry could be very supportive to students and alleviate pressure on teaching time because poems will not need to be memorised. This would be seen as a positive move by teachers.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

English Language and Literature

vi. Proposals for each GCE AS and A level subject (p.26-43)

1. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

2. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Environmental Science

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Neither agree nor disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

The proposed change (Permit observation of demonstrations / simulations of practical activities to cover required skills and techniques) does not provide clarity on whether there will still be the requirement to complete the set number of days of practical and laboratory work as required by the AS- and A-level specifications (a minimum of two days for AS- and four days for A-level). If the requirement remains, it is also not clear whether these demonstrations or simulations could take the place of the days students would have spent in the field or laboratory.

Clarity on this will be necessary both for centres and for AQA to administer the centre declaration form. If the proposal means that this requirement is reduced in either of the two ways described above, then it will be a viable and beneficial option.

Film Studies

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE **AS level** subject (p.26-43)

N/A

vi. Proposals for each GCE **A level** subject (p.26-43)

N/A

Food Preparation and Nutrition

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Removal of NEA 1

This seems a sensible suggestion in light of the situation. This will give schools time to reorganise and while NEA 1 is an important part of the course, for this year, we feel it is appropriate to remove it and continue to assess the same assessment objectives in the exam. Removing NEA 1 will cause some disadvantage to students who excel in this area but may have difficulty under exam conditions but we feel that this issue is outweighed by other disadvantages of keeping NEA 1 in the qualification during this time.

Earlier release of tasks

The release of the NEA 2 tasks would assist teachers in the planning of the curriculum and would not be an advantage or disadvantage to candidates.

Reduction in time and dishes for NEA 2

This would not affect the coverage of practical skills or adversely impact on the students' choice of dishes. We also have the advantage that Section B allows for the demonstration of technical skills; we should insist on only three dishes to be completed in Section B. Reducing the practical assessment time to two hours would mean that large centres would have the opportunity to organise two practical assessments within a day, reducing timetabling issues and removal of students from other curriculum areas – which will be a major concern for other subjects. Reducing the requirement to two dishes would also reduce the amount required to complete Section E as nutritional analysis/costing and sensory testing would only be required for two dishes rather than three.

NEA 2 will still be a challenge in many schools but it is certainly possible. Feedback from teachers suggests that the majority of schools are getting prepared for this and have some social distancing ideas in place for September.

Permit demonstrations of preparation and cooking techniques by teachers

There is considerable confusion over this aspect of the consultation. It needs clarifying that this does not relate to the NEA but to the coverage of the practical element of the specification. As it is currently worded, it could be interpreted that students do not need to 'cook' as part of NEA 2 which would mean that 50% of the qualification is based on 22 marks out of 70 in NEA 2. We strongly disagree that this is a viable proposal and have to assume that this statement simply suggests that teachers may teach the subject content through demonstrations rather than asking the students to do their own practical. This of course has always been an option to teachers and for many, forms the majority of lesson

time.

Further Maths

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Geography

i. Sampling of subject content (pp.10-2)

6. To what extent do you agree or disagree that students taking GCSE geography exams in 2021 should not be required to undertake or be assessed on fieldwork?

Disagree

7. Do you have any comments on the proposal to remove the fieldwork requirement and exam questions relating to fieldwork from GCSE geography exams in 2021?

Whilst we agree that students taking GCSE Geography exams in 2021 should not be required to undertake or be assessed on physical outdoor fieldwork if the ongoing public health risks make it impermissible, we value it as an important part of geography.

Fieldwork is an important feature of the qualification and, being outdoors, carries low risk. While we recognise the difficulties, we would prefer content relating to fieldwork to remain assessable in 2021. If lockdown policy makes this impermissible, virtual fieldwork can be developed and undertaken (eg including manipulation of unprocessed data sets, remote data collection eg online questionnaires etc).

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

The proposed assessment arrangements for 2021 (Retain requirement for total fieldwork time but permit this to be conducted in shorter sessions/activities) is already part of our specification (fieldwork can be completed in a number of ways: locally or further afield, on full days or on part days). Thus, it does not represent an access arrangement.

Given the limitations on being able to complete data collection in the field – with public health restrictions (which have led to the removal of fieldwork in Geography GCSE), it may be challenging for centres to arrange two days' worth of fieldwork (however divided) outside the classroom safely.

We suggest that the two-day rule is retained, but the scope is widened at allow centres to include virtual fieldwork (including manipulation of unprocessed data sets, remote data collection eg online questionnaires etc) within the remit of the two days. This increases the ease/safety with which the requirement can be fulfilled, whilst protecting the integrity of the assessment, as students will still be able to answer fieldwork questions in the exam.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

The proposed assessment arrangements for 2021 (Retain requirement for total fieldwork time but permit this to be conducted in shorter sessions or activities) is already part of our specification (fieldwork can be completed in a number of ways: locally or further afield, on full days or on part days). Thus, it does not represent an access arrangement.

As with AS Geography, the proposal does not go far enough in order to secure a safe fieldwork environment for students during their four days (which is taken into consideration in both GCSE Geography and the comparable four-day fieldwork requirement in A-level Environmental Science [Permit observation of demonstrations or simulations of practical activities to cover required skills and techniques. Rationale: To reduce pressures on teaching time and to accommodate potential on-going public health restrictions]).

We suggest the four-day rule is retained, as it is fundamental to the students producing their independent investigations (NEA).

However, in order for students to safely complete the fieldwork and therefore their subsequent NEA, we propose the scope is widened at allow centres to

include virtual fieldwork (including manipulation of unprocessed data sets, remote data collection eg online questionnaires etc.) within the remit of the days. This increases the ease with which the requirement can be fulfilled, whilst protecting the integrity of the assessment and resulting in no change in demand; the NEAs that students produce could (where appropriate) draw heavily from remote data sources, minimising time in the field at student locations (which would still be required in some context in order to fulfil the requirements of the mark scheme).

Geology

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

History

i. Sampling of subject content (pp.10-2)

- 4. To what extent do you agree or disagree that centres should have a choice of topics on which their students will answer questions for GCSE history and GCSE ancient history in 2021?**

Agree

- 5. To what extent do you agree or disagree with the proposed assessment arrangements for GCSE history and GCSE ancient history exams in 2021 as set out in annex C?**

Agree

- 6. Do you have any comments on the proposal to allow centres a choice of topics on which their students will answer questions for GCSE history and GCSE ancient history exams and/or any of the proposed assessment arrangements for particular specifications in 2021?**

The proposal is an appropriate and proportionate response to the current circumstances. If adopted, it will make the History GCSE in 2021 more manageable for centres and fairer for students.

The proposal would, however, cause issues from an operational perspective. For example, the different approach to optionality would require a significant change to entry codes, which in itself would increase risks of incorrect entries by

centres choosing wrong options. Careful thought must therefore be given to how the proposal would be put in to practice in 2021.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

As the AS in History can be studied in one year, we do not think that the current situation necessitates any change to this qualification for 2021.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

We disagree with the rationale provided on page 26 for proposing no changes to A-level History.

As the AS-level in History can be studied in one year, we do not think that the current situation necessitates any change to this qualification for 2021. We also agree with the proposal insofar as there should no removal or alteration to the NEA in A-level History in 2021, as this would affect the validity of the specification and would cause significant problems for those centres that have already started this component.

However, we would propose that further consideration should be given to adjusting the examined components for 2021 at A-level to account for the impact of school closures. For example, increasing the optionality within the question papers in such a way so as to ensure that those who had been unable to absorb the full content requirement would not be unduly penalised could be considered.

History of Art

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Latin

v. Proposals for each GCSE subject (p.16-25)

N/A

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Law

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Maths

v. Proposals for each GCSE subject (p.16-25)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

We agree. We would, however, support a reduced burden on students in the form of fewer facts and formulae to memorise – perhaps through the provision of a formula sheet.

vi. Proposals for each GCE AS and A level subject (p.26-43)

21. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

22. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Media Studies

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

We believe that this is positive and viable response.

This approach would require some additions to be made to the existing NEA Set Briefs, including both a general statement on the requirements of a prototype or mock-up and specific guidelines on what is required if the prototype or mock-up option is chosen in the case of each Set Brief.

There would be no requirement to amend the marking scheme as AO3 marking criteria relate to elements of the Theoretical Framework rather than the technical qualities or levels of finish of the finished product.

However, marking guidance would need to be provided to teachers to ensure prototypes are marked to the same standard as fully realised productions.

If work is needed for standardising prototype submissions then this would need to be live work from this year which could present us with some significant challenges in terms of accessing materials from centres.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

We believe that this is positive and viable response

This approach would require some additions to be made to the existing NEA Set Briefs, including both a general statement on the requirements of a prototype or

mock-up and specific guidelines on what is required if the prototype or mock-up option is chosen in the case of each Set Brief.

There would be no requirement to amend the marking scheme as AO3 marking criteria relate to elements of the Theoretical Framework rather than the technical qualities or levels of finish of the finished product.

However, marking guidance would need to be provided to teachers to ensure prototypes are marked to the same standard as fully realised productions.

If work is needed for standardising prototype submissions then this would need to be live work from this year which could present us with some significant challenges in terms of accessing materials from centres.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

We believe that this is positive and viable response

This approach would require some additions to be made to the existing NEA Set Briefs, including both a general statement on the requirements of a prototype or mock-up and specific guidelines on what is required if the prototype or mock-up option is chosen in the case of each Set Brief.

There would be no requirement to amend the marking scheme as AO3 marking criteria relate to elements of the Theoretical Framework rather than the technical qualities or levels of finish of the finished product.

However, marking guidance would need to be provided to teachers to ensure prototypes are marked to the same standard as fully realised productions.

If work is needed for standardising prototype submissions then this would need to be live work from this year which could present us with some significant challenges in terms of accessing materials from centres.

Modern Foreign Languages

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Speaking component

The detail provided in the consultation document has raised a number of key questions which require clarification before we are able to give a definitive response.

- Is it the intention that all students receive a speaking endorsement if they are entered for a GCSE exam in MFL? Will it be optional?
- Is there an intention for teachers to conduct any form of end of course assessment for each student? If so, would this assessment be recorded? Would there be any moderation, sampling or verification for the speaking component?
- Would the common assessment criteria mentioned in the consultation document be on the basis of Pass, Merit and Distinction in line with the current Spoken English endorsement?
- If the criteria are to be based on the 9-1 grading scale, would this be restricted by the tier of entry of the student? For example, could a student entered for Foundation tier receive an endorsement for speaking at Grade 6?
- If the endorsement is graded by teachers alone, the outcomes could be influenced by bias or be inflated because of the lack of controls. Would there be any mechanism to mitigate this?

We would like to put forward an alternative proposal for the speaking component by way of a reduced assessment in these exceptional circumstances which we feel would protect the integrity of the exam in its entirety and promote the importance of speaking as a valued skill.

The General Conversation is worth approximately 50% of the marks across the three exam boards in the current speaking test and is based on the discussion of two Themes. In order to compensate for the impact of lockdown, students could take part in a General Conversation on two Themes of their individual choice, conducted and recorded by the teacher and marked by external examiners in the normal way. As in the current specification, students would not know in advance the questions they will be asked and the assessment criteria as it currently stands (which teachers are wholly familiar with) could be used. At foundation tier, students could take part in a conversation of 3-5 minutes and 5-7 minutes at Higher Tier. No preparation time would be needed so this would reduce the time needed for conduct of the tests and reduce the burden for teachers. This approach would mean that the two unpredictable elements of the speaking test are removed (role play and photo card) yet the important skill of

speaking will continue to be practised as part of teaching and learning and ensure that those students intending to go on to further study have not lost ground. It would also ensure that those students whose strengths lie in speaking and who struggle in writing are able to fulfil their potential. It is our experience that many less able students and those with specific learning difficulties such as dyslexia often perform better in the speaking test than in written papers and the absence of a speaking test contributing to their final grade will be unfair.

In addition, although speaking is clearly the skill which has been most impacted by lockdown, teaching and learning for the Speaking test also benefits students in terms of preparation for the other productive skill of Writing.

If the speaking test does not contribute to a student's final grade, we are concerned that the lack of practice of and confidence in speaking may result in a reduction in the number of students opting to take A-level languages where 30% of the marks are for speaking.

We would also point out that the proposal for speaking as it currently stands is likely to disadvantage private candidates and students who study for a language within their community or religious institution. For example, there are over 200 Polish Saturday Schools in the UK preparing students for GCSE Polish. A small number of students in the small entry languages have been entered in 2020 and will get CAGs, but for students where it was not possible for the appropriate evidence to be endorsed, they were advised to enter in 2021. Our alternative proposal above would allow for private candidates and students in any language who are taught outside of mainstream schools to take the exam in full.

Vocabulary

Page 23 of the consultation document includes the proposal to 'Remove the requirement to use words outside the vocabulary lists. Permit glossing where necessary.'

The GCSE Subject Level Conditions and Requirements for Modern Foreign Languages refers to the requirement on the awarding organisation to ensure that Foundation Tier assessments 'require Learners to understand and respond to common or familiar words and/or forms of words that are not on the vocabulary list' and Higher Tier assessments 'require Learners to understand and respond to words and/or forms of words that are not on the vocabulary list and which are less common or familiar than those used in relation to foundation tier assessments'.

We seek clarification on whether 'use' (in the consultation document) means the same as 'understand and respond to' in the subject level conditions and requirements. That is, is the proposal to remove the need to target or test words outside the vocabulary lists? If so, the words 'target' or 'test' would be more helpful than 'use' since the proposal as it stands could be interpreted to mean that there is no requirement to include words from outside the vocabulary lists in the stimulus passages and texts at all.

The current AQA vocabulary lists do not contain cognates or words which students would be expected to know from their prior study, as KS4 assessments are designed to build on KS3 study.

Glossing of words does already feature in our papers for Reading. However, words which are glossed cannot be tested as they no longer provide any value in assessment terms. This may necessitate the rewording of a number of questions or texts.

Question paper production and quality assurance

If changes to vocabulary requirements are to be made, this would mean re-writing some questions or potentially entire papers. This work would need to be carried out to very short timescales at a time when associates will have marking responsibilities for the autumn 2020 series. To comply with Ofqual's G4 conditions many of the MFL subjects have already produced two sets of papers for 2021.

Our 2021 papers will all be finalised by the end of the current consultation. If, following the consultation, these significant changes are to be made, will exam boards be permitted to decide which of the two papers is being used for 2021 at an early stage, so that only one set of papers needs to be amended?

This huge extra demand on associates has the potential to increase the risk to quality across both their assessment writing and examining work, as well as requiring changes to our production process, again increasing risks to quality.

We also seek clarification on whether, in the speaking endorsement, there will be grades (eg Pass/Merit/Distinction, as for the spoken language endorsement in GCSE English Language); and whether there will be any monitoring, verification or moderation; and what will happen regarding GCSE certification for candidates who failed to do the endorsement.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

The proposal is deliverable but we have some concerns.

While we broadly agree with retaining 70% examination and 30% NEA, as it's important that students have the opportunity to demonstrate their spoken language skills and their research skills through the NEA, we feel that current Year 12 students will have suffered significantly from a lack of face-to-face teaching and learning. The A-level subject criteria say, 'At A-level, specifications

must require students to study two works, either a literary work and a film, or two literary works.’ Our proposal would be that this requirement be reduced and that students be allowed to study and be assessed on just one work, either a literary work or a film. This would need to be kept flexible as some students may already have studied either in Year 12.

The same AOs and skills are assessed for both works, so the burden on teaching time could quite easily be reduced without compromising the skills developed by the student for future study. The teaching and learning time which would be freed up by this move could be invested in developing the speaking skills, which are likely to have suffered significantly from a lack of face-to-face teaching and learning, and on development and consolidation of knowledge of grammar. This measure would also go some way towards mitigating what might still prove to be a disrupted academic year from September.

We would also recommend making a minor change to the NEA. This is taken in April, before the main exam season, and we recognise that, next year, some students will not have covered the full specification by the time they take their speaking test. Each student is given a combination of speaking cards according to a table published with the assessment materials. Each card is based on one of twelve sub-themes in the specification. We have no way of knowing in which order individual schools address these sub-themes so it would be unfair to address the loss of teaching time by omitting some sub-themes from the set of cards. Instead, we would like teachers to be given the option to offer only cards based on sub-themes that they have covered in detail in class.

A-level MFL (Listening, Reading, Writing)

The proposal is deliverable but we have some concerns.

This group of languages is assessed by 100% terminal exam and there is no speaking assessment, therefore students will not have missed out on the opportunity to develop their speaking skills but their learning will have been impacted by lockdown in other ways. It is our view that, if our proposal above were to be adopted, there would be an inconsistency across A-level MFL if no changes were made to this group of languages and this would be perceived as inequitable. We therefore recommend making the same change here as above: reducing the requirement to study two works to one, which could be either a literary work or a film. This would free up teaching and learning time to focus on research and essay-writing skills and consolidation of grammar. As with the other A-level MFL, the same AOs and skills are assessed for both works so this change would not compromise the student’s development of the skills required for progression to further study.

Music

v. Proposals for each GCSE subject (p.16-25)

1. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

2. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Reduce requirement to complete a Performance Assessment to 1 or more pieces of music with a combined duration of at least 1.5 minutes (if all solo performance) or 2 minutes (if including performance as part of an ensemble). No requirement to perform as part of an ensemble.

- Strongly agree
- Would like some additional clarity on the penalty requirements.

For the Performance Assessment, requirement to submit complete and unedited recording of the live performance and, where available, the score or lead sheet for that performance

- Strongly Agree
- No change

Reduce requirement to complete a Composition Assessment to 1 or more pieces of music with a combined duration of at least 2 minutes. Compositions may be in response to an exam board set brief and/or be freely composed, with no requirement to do both.

- Disagree
- Is this exam board choice or centre choice? There needs to be certainty and consistency across all awarding bodies.
- This should be either a free or set brief to ensure fairness to all. We would support a move to only free brief because this would mean some centres who have already been working on it won't have lost work or time.
- There is also a risk that we will effectively have two separate cohorts. One that has completed a composition to a brief and one that has freely composed. It may be difficult to mark the work of students who have produced such vastly different work on the same scale which could lead to us having to mark and award two separate cohorts.
- If left as an exam board choice we would select only the free brief to be complete and one piece for a minimum of two minutes.

For the Composition Assessment, requirement to submit complete recording of each composition with a score, lead sheet or written account of the composition,

produced by the student. NB: The student does not have to perform their own composition(s). The recording(s) may be computer generated.

- Strongly agree
- No change

Both NEA components may be marked by the teacher and moderated by the exam board or marked directly by the exam board.

- Agree
- No change for how AQA GCSE is moderated.

Additionally we would like some clarity on whether the composition can be completed in unsupervised time, which would be a change from the current high levels of control. This would mitigate any potential issues of additional periods of school closure or student quarantine.

vi. Proposals for each GCE **AS level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Reduce requirement to complete a Performance Assessment of 1 or more pieces of music to a combined minimum duration of at least 2.5 minutes.

- Strongly Agree
- Would like some additional clarity on the penalty requirements.

For the Performance Assessment, requirement to submit complete and unedited recording of the live performance and, where available, the score or lead sheet for that performance.

- Strongly Agree
- No change

Reduce requirement to complete a Composition Assessment to 1 or more pieces of music with a combined duration of at least 2.5 minutes. Compositions may be in response to an exam board set brief and/or freely composed.

- Disagree

-
- Is this exam board choice or centre choice? There needs to be certainty and consistency across all awarding bodies.
 - This should be either free or set brief to ensure fairness to all.
 - There is also a risk that we will effectively have two separate cohorts. One that has completed a composition to a brief and one that has freely composed. It may be difficult to mark the work of students who have produced such vastly different work on the same scale which could lead to us having to mark and award two separate cohorts.
 - If it were an exam board choice we would select only the free brief to be completed.

For the Composition Assessment, requirement to submit complete recording of each composition with a score, lead sheet or written account of the composition, produced by the student. NB: The student does not have to perform their own composition(s). The recording(s) may be computer generated.

- Strongly Agree
- No change

Permit both NEA components to be marked by the teacher and moderated by the exam board or marked directly by the exam board.

- Strongly Agree
- AQA would continue to examine both components

Permit the exam board to review the period in which the Performance Assessment can be undertaken, within the year of certification.

- Strongly agree
- We would look to remove any window of completion for 2021

Additionally, we would like some clarity on whether the composition can be completed in unsupervised time, which would be a change from the current high levels of control. This would mitigate any potential issues of additional periods of school closure or student quarantine.

vi. Proposals for each GCE **A level** subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Reduce requirement to complete a Performance Assessment of 1 or more pieces of music with a combined minimum duration to at least 2.5 minutes (25% weighting), at least 3 minutes (30% weighting), or at least 3.5 minutes (35% weighting).

- Neither Agree nor Disagree
- We would like some additional clarity on the penalty requirements.
- We would suggest changing the reductions to 50% of the original times. This would be more consistent with the changes for composition.

25% - 3 minutes

30% - 4 minutes

35% - 5 minutes

For the Performance Assessment, requirement to submit complete and unedited recording of the live performance and, where available, the score or lead sheet for that performance.

- Agree
- No change

Reduce requirement to complete a Composition Assessment to 1 or more pieces of music with a combined duration of at least 2 minutes (25% weighting), 1 or more pieces of music with a combined duration of at least 3 minutes (30% weighting), or 2 or more pieces with a combined duration of at least 4 minutes (35% weighting). Compositions may be in response to an exam board set brief and/or freely composed.

- Disagree
- Is this an exam board choice or centre choice? There needs to be certainty and consistency across all awarding bodies.
- Should be either a free or set brief to ensure fairness to all.
- There is also a risk that we will effectively have two separate cohorts. One that has completed a composition to a brief and one that has freely composed. It may be difficult to mark the work of students who have produced such vastly different work on the same scale which could lead to us having to mark and award two separate cohorts.
- If it were an exam board choice we would select only the free brief to be completed.

For the Composition Assessment, requirement to submit complete recording of each composition with a score, lead sheet or written account of the composition, produced by the student. NB: The student does not have to perform their own composition(s). The recording(s) may be computer generated.

- Strongly Agree
- No change

Permit both NEA components to be marked by the teacher and moderated by the exam board or marked directly by the exam board.

- Strongly agree
- AQA will continue to examine these components

Permit the exam board to review the period in which the Performance Assessment can be undertaken, within the year of certification.

- Strongly agree
- We would look to remove any window of completion for 2021

Additionally, we would like some clarity on whether the composition can be completed in unsupervised time, which would be a change from the current high levels of control. This would mitigate any potential issues of additional periods of school closure or student quarantine.

Music Technology

vi. Proposals for each GCE AS and A level subject (p.26-43)

N/A

Philosophy

vi. Proposals for each GCE AS and A level subject (p.26-43)

- **To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021**

Agree

- **Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?**

None.

Physical Education

v. Proposals for each GCSE subject (**full course**) (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Retaining the current overall assessment structure, weightings and number of assessments is agreed.

The reduction in the number of activities from three to two is agreed.

The change to 'allow both to be individual' activities is also agreed in order to mitigate possible issues with team activities. This wording does not appear to preclude students doing any combination of team/individual activities. However, we would like it to be confirmed that students can complete any combination (ie two individual activities or two team activities or one of each). This is necessary as some students may already have evidence for two team activities.

The statement to 'permit remote moderation using videoed evidence for all activities' is agreed. This is the usual situation at present, and we have used both live and remote moderation of candidate work in previous series. As a result, it is unclear whether this being listed as a change and the use 'of 'permits' precludes 'live moderation' should that be possible in 2021. We would strongly encourage live moderation be allowed if public health conditions permit. If this is not possible and all moderation is carried out remotely, and requires centres to have to have video evidence for all candidates, it will greatly increase the burden on centres to record more candidate activity than was the case previously. This will particularly be the case for those centres which do not video at all, more frequently at GCSE level. If required, we suggest to ease this that the rules around sampling in PE be revisited to ensure that the burden is manageable whilst still ensuring centres still submit enough evidence that moderators can confidently assess the standard.

Gathering of video evidence for some sporting activities (eg skiing, some summer sports) may be difficult depending on future circumstances. Can the evidence requirements be revisited to that we can accept other forms of evidence, older footage or incomplete footage?

There are some concerns that video recordings do not adequately capture candidate performances, in particular when participating in team sports.

Candidates who excel in team activities could also be disadvantaged more than those who favour individual sports because they may have had less opportunity

to compete in the competitive context due to restrictions during and after lockdown.

It might prove impossible in some sports, such as rugby where there is a lot of close contact, to assess the candidate in a competitive context at all.

Some candidates may have chosen to switch sports to be able to proceed but they may be weaker in that sport and so be disadvantaged.

Candidates who usually compete and perform at a high standard in a sport may not be able to compete to that standard through no fault of their own. We are unsure of how this could be compensated.

There are concerns as to how the change to the NEA assessment could affect year-on-year comparability and the awarding of grades. If each student has to be good in only two sports rather than three (plus a possible exacerbation of that impact of team sports specialists) we may expect a different distribution of marks with higher scores submitted.

v. Proposals for each GCSE subject (**short course**) (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Disagree

19. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Retaining the current overall assessment structure, weightings and number of assessments is agreed.

The reduction in the number of activities from three to two is agreed.

The change to 'allow both to be individual' activities is also agreed in order to mitigate possible issues with team activities. This wording does not appear to preclude students doing any combination of team/individual activities. However, we would like it to be confirmed that students can complete any combination (ie two individual activities or two team activities or one of each). This is necessary as some students may already have evidence for two team activities.

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vi. Proposals for each GCE AS and A level subject (p.26-43)

18. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

19. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

AS-level

Retaining the current overall assessment structure, weightings and number of assessments is agreed.

The statement to 'permit remote moderation using videoed evidence for all activities' is agreed. This is the usual situation at present, and we have used both live and remote moderation of candidate work in previous series. As a result, it is unclear whether this being listed as a change and the use 'of 'permits' precludes 'live moderation' should that be possible in 2021. We would strongly want live moderation to also be allowed if public health conditions permit. If this is not possible and all moderation is carried out remotely, and requires centres to have to have video evidence for all candidates, it will greatly increase the burden on centres to record more candidate activity than was the case previously. This will particularly be the case for those centres which do not video at all. If required, we suggest to ease this that the rules around sampling in PE be revisited to ensure that the burden is manageable whilst still ensuring centres still submit enough evidence that moderators can confidently assess the standard.

Comments and concerns

- Gathering of video evidence for some sporting activities (eg skiing, some summer sports) may be difficult depending on future circumstances. Can the evidence requirements be revisited to that we can accept other forms of evidence, older footage or incomplete footage?
- There are some concerns that video recordings do not adequately capture candidate performances, in particular when participating in team sports.
- Candidates who excel in team activities could also be disadvantaged more than those who favour individual sports because they may have had less opportunity to compete in the competitive context due to restrictions during and post-lockdown.
- It might prove impossible in some sports, such as rugby where there is a lot of close contact, to assess the candidate in a competitive context at all.
- Some candidates may have chosen to switch sports to be able to proceed but they may be weaker in that sport and so disadvantaged.
- Candidates who usually compete and perform at a high standard in a sport may not be able to compete to that standard through no fault of their own. We are unsure of how this could be compensated.

A-level

Retaining the current overall assessment structure, weightings and number of assessments is agreed.

The statement to 'permit remote moderation using videoed evidence for all activities' is agreed. This is the usual situation at present, and we have used both live and remote moderation of candidate work in previous series. As a result, it is unclear whether this being listed as a change and the use 'of 'permits' precludes 'live moderation' should that be possible in 2021. We would strongly want live moderation to also be allowed if public health conditions permit. If this is not possible and all moderation is carried out remotely, and requires centres

to have to have video evidence for all candidates, it will greatly increase the burden on centres to record more candidate activity than was the case previously. This will particularly be the case for those centres which do not video at all. If required, we suggest to ease this that the rules around sampling in PE be revisited to ensure that the burden is manageable whilst still ensuring centres still submit enough evidence that moderators can confidently assess the standard.

Comments and concerns

- Gathering of video evidence for some sporting activities (eg skiing, some summer sports) may be difficult depending on future circumstances. Can the evidence requirements be revisited to that we can accept other forms of evidence, older footage or incomplete footage?
- There are some concerns that video recordings do not adequately capture candidate performances, in particular when participating in team sports.
- Candidates who excel in team activities could also be disadvantaged more than those who favour individual sports because they may have had less opportunity to compete in the competitive context due to restrictions during and post-lockdown.
- It might prove impossible in some sports, such as rugby where there is a lot of close contact, to assess the candidate in a competitive context at all.
- Some candidates may have chosen to switch sports to be able to proceed but they may be weaker in that sport and so disadvantaged.
- Candidates who usually compete and perform at a high standard in a sport may not be able to compete to that standard through no fault of their own. We are unsure of how this could be compensated.

Physics

v. Proposals for each GCSE subject (p.16-25)

v. Proposals for each GCSE subject (p.16-25)

27. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Neither agree nor disagree

28. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Demonstrations and videos are appropriate but would need to cover more than the minimum eight or sixteen experiments.

Centres and exam boards have found, in pre-lockdown times, that the minimum of eight practical experiments each for separate sciences and sixteen for combined sciences was insufficient to cover all of the Apparatus and Techniques statements, and so in fact undertake more. Clarifying that the Apparatus and Techniques statements should still be met even with practical observations would be helpful and necessary.

Further, we note that observing an activity does not entail as much learning as undertaking an activity. We would favour observing an activity to be permissible if lockdown necessitates it, while preferring students to obtain first-hand experience where possible.

vi. Proposals for each GCE **AS level** subject (p.26-43)

29. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Neither agree nor disagree

30. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

For AS-level, please see our concerns about how many the wording of guidance on how many practical experiments should be observed, if students have to observe teachers undertaking them, and ensuring the minimum number meets the Apparatus and Techniques statements.

vi. Proposals for each GCE **A level** subject (p.26-43)

25. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Disagree

26. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

On changing the requirements for the Practical Endorsement to allow assessment of the Common Practical Assessment Criteria (CPAC) across the minimum number of practical activities required to demonstrate competence, AQA's view is that the 'minimum number of practical activities required' would have to be very carefully defined. In each specification, the 12 required practical activities have been carefully selected so as to cover all of the 12 subject-specific apparatus and techniques (AT a-l) required by each specification. Familiarity with these apparatus and techniques is often assessed via exam papers, as well as within the Practical Endorsement CPAC assessments. Coverage of ALL apparatus and techniques listed in each specification should therefore be mandatory; this is the most straightforward way to ensure this coverage would be by engaging in all 12 required practical activities.

Politics

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Strongly agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Psychology

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

None.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

On balance therefore, we accept that Ofqual's proposal is probably the most sensible way forward, notwithstanding the teachers' strong objections.

Religious Studies

v. Proposals for each GCSE subject (**full course**) (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Following discussions both internally and with senior associates, we agree overall with the proposals for GCSE RS. Any changes made at this stage in the specification would inevitably advantage some students while disadvantaging others. As there are so many variables in terms of teaching time, two- and three-year GCSE courses and variety of provision during lockdown, it is not possible to make changes to the assessment and still remain fair to all those entered.

v. Proposals for each GCSE subject (**short course**) (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

Following discussions both internally and with senior associates, we agree overall with the proposals for GCSE RS. Any changes made at this stage in the specification would inevitably advantage some students while disadvantaging others. As there are so many variables in terms of teaching time, two- and three-year GCSE courses and variety of provision during lockdown, it is not possible to make changes to the assessment and still remain fair to all those entered.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

Following discussions both internally and with senior associates, we agree overall with the proposals for A-level RS. Any changes made to the assessments would inevitably advantage some students while disadvantaging others. The fairest way to approach the 2021 series is for the series to be the same as what is currently expected, ie the papers the students have been preparing for for a full academic year; to change things would add confusion and the risks of this would outweigh the possible benefits.

Sociology

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

None.

vi. Proposals for each GCE AS and A level subject (p.26-43)

19. To what extent do you agree or disagree with the proposed assessment arrangements for each AS and A level subject in 2021

Agree

20. Do you have any comments on the proposed assessment arrangements for each GCE AS and A level subject in 2021?

None.

Statistics

v. Proposals for each GCSE subject (p.16-25)

17. To what extent do you agree or disagree with the proposed assessment arrangements for each GCSE subject in 2021?

Agree

18. Do you have any comments on the proposed assessment arrangements for each GCSE subject in 2021?

None.

vii. Equality impact assessment (pp.44-5)

21. Are there any potential equality impacts that we have not explored? What are they?

The impact of changing the MFL speaking element to an endorsement will particularly impact minority languages, where marks for speaking are often compensatory.

There are some subjects where the component-component correlation of the assessments that make up a qualification is particularly weak (eg PE, where students may excel in the practical and struggle in the written assessment). There will be any number of reasons for this, but some may be due to a student's ability in written assessment from conditions such as dyslexia. Whilst NEA is going ahead in some subjects, modifications in others mean that the rank-ordering of students may not be as reliable as when the assessment is offered in the usual way. A subject like Design & Technology is an example of this, whereby a student may not have an opportunity to make a high-quality product, and the proposed adaptations will not sufficiently compensate for this.

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

To the extent that mitigations are possible, they are best explored by Ofqual with the exam boards on a subject-by-subject basis.

viii. Regulatory impact assessment (pp.45-6)

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

The proposals advanced by Ofqual across multiple subjects are wide-ranging and will have a number of impacts for exam boards, a selection of which are listed below.

Changes to submission times of NEA may result in challenges with compliance for awarding organisations and/or centres.

New marking criteria will need to be written for subjects where NEA work is changing (eg changing MFL speaking tests to endorsements and changing requirements for Dance or Music). Teachers and moderators will need to be trained in applying these changed criteria, which will be burdensome as such training will need to be developed and delivered by awarding organisations, and undertaken by teachers at a time when they are dealing with the disruption caused by lockdown for not just next year's exam cohort but by students in all year groups.

For any assessments which need amendment, we will only produce one set of assessments. This may mean that Conditions A4 (Conflict of interest) and G4 (Maintaining the confidentiality of assessments) would not be adhered to in the normal way, although safeguards could be put in place.

Additionally, for Condition D1 (Fitness-for-purpose), the validity and comparability of assessments could be affected, either by amendments to assessments or changes in the preparedness of students. For example, it could be that a paper is of comparable demand to previous years', but the experienced difficulty for students is affected. We do not feel this presents a

material challenge in our ability to generate a meaningful rank-order of students or to differentiate by grade, but it could be, for example, that inter-year grade boundary fluctuations are higher than normal. This would attract considerable negative attention, and would need to be very carefully and extensively communicated to students, teachers, parents, HEIs, employers, non-exam-specialist education stakeholders, the media and the general public.

24. What additional costs do you expect you would incur if the proposed changes to the exam and assessment arrangements were introduced for summer 2021?

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

More immediately measurable costs are included below.

Teacher support events and exemplar materials, teacher standardisation materials and events for a range of subjects will be required in much greater number and scope, and for which new content will have to be devised and produced.

Additional examiner and moderator training will have to be developed and delivered in order to promote understanding of the changes and to allow engagement and familiarisation with new methods of assessment (eg video instead of visits).

There will be a significant amount of new system set-up and development required within a short period, which might be redundant after this exceptional series.

Examiner shortages in July and August may result in additional incentive payments having to be offered when practising teachers will necessarily want to focus on making up for lost teaching time.

Additional staffing and other exceptional arrangements made at scanning bureaus if script deliveries are concentrated in a shorter period and the overall timetable is shorter.

Additional staffing at exam boards to meet concentrated processing demands.

Greater use of external venues for standardisation and awarding if condensed into tighter periods.

Significant development costs for production of assessments that are amended.

For subjects where amendments to assessments are needed, we feel we would have to issue new specimen materials to help students familiarise themselves with the assessment before they take the real papers. This brings significant additional cost for each assessment.

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

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