



ASSOCIATION
OF COLLEGES

Ofqual consultation on exceptional arrangements for exam grading and assessment in 2020

AoC's response to the consultation questions

29 April 2020

Centre Assessment Grades

1. To what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year? **Strongly agree**
2. To what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity? **Strongly agree**
3. To what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law? **Strongly agree**
4. To what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above? **Strongly agree**
5. To what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice? **Strongly agree**
6. Do you have any comments about our proposals for centre assessment grades?

Over 100 colleges have at least 500 candidates for GCSEs in English and maths. We are concerned about the requirement for centres with a high number of subject entries (eg: several hundred) to provide a single centre ranking for all their candidate grades. We think this would create unnecessary workload trying to moderate student grades across large teaching teams without providing any additional degree of accuracy. We would suggest that it should be possible to submit rankings either by teacher or in smaller groupings (eg: 150) and for candidates to be able to share the same rankings, with no more than 50 ranking points per grade.

Issuing results

7. To what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer, in accordance with the approach we will finalise after this consultation, and not by any other means? **Strongly agree**
8. Do you have any comments about our proposal for the issuing of results?

We understand that existing planned results days for GCSE and A Level in August have now been confirmed.

Impact on students

9. To what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted? **Strongly agree**
10. To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK? **Strongly agree**
11. To what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications? **Strongly agree**
12. Do you have any comments about the impact of our proposals on any particular groups of students?

Statistical standardisation of centre assessment grades

The proposed aims of the standardisation process are as follows:

- to provide students with the grades that they would most likely have achieved had they been able to complete their assessments in summer 2020
- to apply a common standardisation approach, within and across subjects, for as many students as possible
- to use a method that is transparent and easy to explain, wherever possible, to encourage engagement and build confidence
- to protect, so far as is possible, all students from being systematically advantaged or disadvantaged, notwithstanding their socio-economic background or whether they have a protected characteristic
- to be deliverable by exam boards in a consistent and timely way that they can quality assure and can be overseen effectively by Ofqual

We will seek to meet these aims while maintaining the standard of qualifications over time. Where the aims listed above are in tension (for example, accuracy of approach versus ease of explanation), we will seek to find an optimal balance.

13. To what extent do you agree or disagree with the aims outlined above? **Strongly agree**
14. To what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of

students is likely to be fairest for all students? **Agree**

15. To what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process? **Strongly Agree**
16. To what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds? **Agree**
17. To what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework? **Strongly agree**
18. Do you have any comments about our proposals for the statistical standardisation of centre assessment grades?

The starting point should be to assume that the CAGs and rankings submitted are accurate and it is then a matter of the relative importance given to the 3 sources of evidence within the statistical standardisation process. In any adjustment, we would suggest that individual prior student achievement should carry the most weight and that the historical outcomes for each centre should have the least bearing on adjustments.

The 16-18 GCSE English and maths cohort will need a different basis for statistical adjustment as it is not a full age-cohort. This also applies to adult GCSE candidates and college based 14-16 year olds. It will be important for colleges to understand how any adjustment has been applied to these cohorts.

It is not possible to predict centre trajectories into the future, as trends in results, whether up or down, cannot be assumed to continue. The post-16 GCSE English and maths cohort is even harder to predict as it can vary from year to year and will be affected by college entry policies. Colleges who feel that their results were going to substantially change will want to reflect that in their centre assessed grades. For example, there are many colleges which will be predicting strong improvements in GCSE maths achievement as a result of major interventions as part of their involvement with Centres for Excellence in Maths or the 5Rs project, so centre results profiles should not simply be linked to past achievements.

The equalities impacts of these arrangements are crucially important and any bias in predictions should be corrected for at the national level. If there is clear research evidence of systemic under-prediction for specific groups of students, this should be corrected for nationally and might require some adjustments to centre rankings because the bias would apply to some students only rather than a whole centre cohort. The impact of any such process on final grades should be reported on.

Appealing the results

19. To what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined? **Strongly agree**

20. To what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre's rank order? **Strongly agree**
21. To what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre? **Strongly agree**
22. To what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated? **Strongly agree**
23. To what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students? **Strongly agree**
24. To what extent do you agree or disagree that we should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered? **Strongly agree**
25. To what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student? **Strongly agree**
26. To what extent do you agree or disagree that exam boards should be permitted to ask persons who were involved in the calculation of results to be involved in the evaluation of appeals in relation to those results? **Strongly agree**
27. To what extent do you agree or disagree that exam boards should be able to run a simplified appeals process? **Strongly agree**
28. To what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model? **Strongly agree**
29. To what extent do you agree or disagree with our proposal to make the Exam Procedures Review Service (EPRS) available to centres for results issued this summer? **Strongly agree**
30. Do you have any comments about our proposals for appealing results?

An Autumn exam series

31. To what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)? **Strongly agree**

To which qualifications will the emergency regulatory measures apply?

32. To what extent do you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualification? **Strongly agree**
33. Do you have any comments about the qualifications to which the exceptional regulatory measures will apply? **We expect that similar arrangements will be applied to the vocational, technical and functional skills qualifications followed by a large proportion of college students.**

Building the arrangements into our regulatory framework

34. To what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and June 2020? **Strongly agree**
35. To what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer? **Strongly agree**
36. Do you have any comments about our proposals for building our arrangements into our regulatory framework?

Equality impact assessment

37. Are there other potential equality impacts that we have not explored? What are they? We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated:

It is clear that disadvantaged students will inevitably be further disadvantaged by the shutdown of colleges and schools this year and all our support and funding systems will need to be mindful of the need to compensate for this.

Regulatory impact assessment

38. Are there additional activities associated with the delivery of the revised approach that we have not identified above? What are they?

The disruption faced by students in 2020 will continue to impact on them throughout 2020/21 and maybe beyond. Colleges will need to provide a range of additional support, both personal and academic, to mitigate for this.

39. What additional costs do you expect you will incur through implementing this approach?

There will be substantial additional costs incurred by colleges in providing additional support during 2020/21 for students affected by the disruption in 2020.

40. What costs will you save?

The cancellation of exams may lead to some savings associated with additional invigilators and additional support staff.

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

(29/04/20)