

## Consultation on how GCSE, AS and A Level grades should be awarded in summer 2021: the OCR response

The following provides a summary of the key points arising from OCR's detailed response to the DfE and Ofqual consultation on the arrangements for General Qualifications in summer 2021.

### 1. Awarding grades to students to reflect the standard at which they are performing

- The proposed approach that 'Grades this year should be based on teachers' assessments of the evidence of the standard at which their students are performing' appears relatively simple. A strongly evidence-based approach can promote public confidence and help with justifying decisions to students and parents in the face of appeals.
- However, there are difficulties presented by the approach. We think it will be necessary to allow teachers to make holistic judgements and to fill some gaps in evidence by drawing on their knowledge of a student's overall performance across time.
- The proposal is very clear that teachers should not be asked to decide the grade a student might have achieved had the pandemic not occurred. However, many stakeholders feel that by ruling this out altogether the proposal introduces a significant unfairness. It is not any student's fault if their learning has been severely disrupted so that they are performing at a lower level than they would have in a normal year.
- Many students and parents are not aware that the approach this year will be different to last year's – if an estimation of how a student would have performed was acceptable last year, they may argue it is unfair to change the approach this year.

#### **We recommended:**

- The proposed commission to look at ways of approaching differential learning should be set up as a matter of urgency to consider these issues and to help avoid a widening of the gap between disadvantaged students and their peers
- Policy makers put in place a strategy to support learners who aren't ready or don't feel they are ready to progress which should include the opportunity to retake their lost year of learning or some other form of 'catch up'.
- The proposed approach to assessing students should be communicated clearly and widely so that there can be a public conversation ahead of results being issued.

### 2. Evidence

We see no reason why the list of suggested GQ evidence should be different from VTQ evidence (for qualifications that feature on performance tables).

**We suggested** the following as potential sources of evidence for teacher judgements:

1. Exam board standardised assessment (for GQs an exam board paper, for VTQs, banked units)
2. NEA

3. Mocks
4. Termly assessments
5. Practical performances or creations – where different to NEA
6. Classwork
7. Ephemeral evidence – observed performance
8. Teacher testimony
9. External tests which provide wider contextual information.

### 3. **Minimum proportion of overall subject content that should be assessed**

- It may be necessary to have a different requirement for different subjects and then between exam boards within subjects depending on the specification design.
- In an exam, a student's knowledge, skills and understanding are only sampled. The same principle should apply here – not all the content of a specification needs to be evidenced. A sufficient sample should allow a teacher make a judgement particularly where teachers struggle to find evidence that covers a large percentage of the content.

#### **We recommended:**

- The approach should be the same for GQs and VTQs
- As suggested by the Joint Council for Qualifications (JCQ), centres use a proforma to capture the rationale for the choices they have made for each candidate
- If a minimum amount of evidence is to be an absolute requirement, then it is important to consider what should be done for those students who, through no fault of their own, have missed so much learning that they do not have sufficient evidence to be given a grade in one or all of the qualifications they were to have taken.

### 4. **Using evidence from throughout a student's course**

Given that we anticipate there will be many occasions when the available evidence is in short supply, a broad picture of performance over time and from a variety of sources gives a stronger basis for making valid and reliable judgements than a smaller range of evidence from a single period of time.

#### **We suggested:**

- The use of guidance to help teachers make judgements about the currency of evidence depending on the qualification and the subject.

### 5. **The use of exam board papers**

- We think the proposition should lean towards providing a set of **optional, locally tailored papers which can be used alongside a basket of other evidence** when seeking to make judgements about a student's grade. We think it is unrealistic to suggest that the papers could be highly standardised, consistently marked, taken by everyone, and heavily weighted towards determining a student's final grade.
- There is a level of uncertainty about the purpose and nature of the proposed 'set of papers' not least because the level of **consistency** between student answers will be low because of the huge differences in amounts of lost learning. Even if students were sitting the same papers it would be challenging to provide grade boundaries for teachers to use ahead of papers being sat. There is also a broader question about which **standard** –

2019 or 2020 – we would want teacher marking to align with. If the requirement was to create a set of high stakes assessments where the outcome resulted in a consistently marked and robustly awarded grade, then exams for this summer should not have been cancelled.

- We can see a value in the results from the papers proposed as something that should be considered alongside a range of evidence but we think there is a risk that their importance will be overstated. It is important to understand that the papers will help generate a consistency of approach and provide some commonality of judgement in limited areas of a specification, but **they are not an instrument that can create a national standard.**
- Exam board papers should be made up of material taken from **past papers**. This is because past papers are the only material where exam boards can provide guidance to teachers about the marking standard. Newly-created questions or papers won't have a standardised mark scheme, any data on performance or any examples of real student responses
- These papers should **not be viewed as live assessment material** subject to the same controls that would normally apply: it is not possible to replicate that level of control in a window of time however tight that may be. The exams have been cancelled and cannot be reinstated by the means of the proposed set of papers.
- If a learner takes these assessments at their centre, then there can be confidence that it is their **own work** and a valid reflection of what they know and can do. However, public health guidance and student safety must be the first priority. If students are isolating or schools closed, alternatives will have to be found (assuming that a decision is made to make these assessments mandatory).

## **6. Teacher marking of papers**

- If papers are to be adapted by teachers, then teachers are best placed to mark them, backed up with training and support from exam boards.
- Nevertheless, internal marking will not achieve the same level of consistency of marking as external marking in a normal series, nor even of moderated marking, because the same sampling and correction methods employed in those processes will not be available.
- On a practical point, internal marking would make the assessment more flexible under the current circumstances. Exam board marking of these papers would take much more time than centre marking, so centre marking seems beneficial to allow results to be returned in July, as is currently proposed.

## **7. Non-exam assessment**

- Where NEA has been completed in circumstances where the student has been able to perform without disadvantage, that NEA should be included in a teacher's judgement of what final grade to submit. This is crucial for all practical subjects.
- Students should not be penalised if they have been unable to complete their non-exam assessment. For some subjects, 'incomplete' coursework would provide substantial amounts of evidence of performance.

- Exam Board moderation of NEA could not be completed in time to inform teacher assessed grades. Teachers should use existing and recognised internal assessment to inform their teacher assessments. At subject-level, AOs have a role in guiding centres on how to use what NEA they have and can complete.
- The parallel consultation on VTQs proposes that the external moderation of NEA in VTQs should continue. It is not clear why there is this inconsistency. GQs and VTQs taken by the same students and age groups should be aligned.

**We recommended:**

- The requirement for external moderation should be waived for both GQs and VTQs.

**8. Timings for final assessments of student performance**

- We would want to maximise the time available for teaching and learning. However we must leave time for teachers to undertake their internal assessment processes, for schools to manage appeals, for exam boards to carry out and complete their processes including quality assurance and results, and for HEIs and others to manage their access arrangements.
- The learner is the most important person in this process and the principled answer as to when final grades should be submitted has to be 'as late as possible to allow for maximum learning time'. However, the proposed timescales will put considerable pressure on the underpinning processes.
- We disagreed with the proposal that evidence taken from closer to the final assessment should have more weighting than other evidence because of individual student circumstances during the pandemic.

**We recommended:**

- Alternative timelines as discussed with JCQ colleagues, highlighting the many dependencies. Certainly for GCSE, there is no obvious rationale for this extremely pressured timeline when it is not what is provided in a normal year.
- Better alignment between GQ and VTQ results release so that VTQ learners are not disadvantaged over their peers.

**9. Training and guidance from exam boards**

- Training should be offered to support consistent approaches and similar standards across the country. However, we must take into account the considerable pressures that schools and colleges are facing, which means they have little time to spare for additional training. We also want teachers to have as much time to spend with their students as possible to make up for lost learning time. The amount of training that teachers will be able to access will be limited, so it must be carefully targeted at the right people and must focus on the essential content they need.

**We recommended:**

- Essential aspects where guidance would be required including, for example, marking set questions, sufficiency of evidence, coverage of subject content, appeals, special considerations, and internal processes for agreeing fair and standardised assessments.

## **10. Internal quality assurance**

- We believe there should be an element of prescription regarding the high level processes that centres must follow and the training that they should undertake. Although we would wish to allow for considerable flexibility to allow for the different sizes and types of centres and the ways in which Covid may have impacted on them differently, it may be helpful to provide some standard documents and proformas outlining the processes to be followed. This is important for managing appeals and as a benchmark against which we can consider any allegations of malpractice. Centres will need to know what we expect of them if we are to judge their delivery of processes in any way.
- The more consistency that can be demonstrated, the better the grades will stand up to scrutiny by individual students and the public more generally. It also enables more clarity on subsequent external quality assurance.

## **11. External quality assurance**

- Strong, clear, early guidance from exam boards will be essential, but the approach should be one of support and collaboration. The external quality assurance should be one that checks that a centre has followed the processes set out in the guidance and asks the question, 'How did you arrive at these grades?' Exam boards should not be reviewing evidence but should be looking at the quality assurance processes used by a centre to arrive at the grades that they have signed off.
- Exam boards are not in a position to override the academic judgements of teachers who have arrived at their decisions based, in part, on their knowledge and familiarity with the students they have assessed and the performances they have witnessed.
- We agree that targeting centres for more in-depth quality assurance makes sense. However, the timescales and the numbers of schools and colleges (and the large size of some of these institutions) means that the capacity to carry out such activity will be limited. In-depth targeting is likely to result in some candidates not having results on results day. It will be important that the public/end users are aware of and accept this risk.

### **We recommended:**

- AO/Ofqual/DfE criteria for sampling centres to ensure some consistency of approach.

## **12. Appeals**

- We disagreed that students should not be told the grade their teacher has submitted before results day and instead proposed a process that involves ongoing discussion between a teacher and a student about the potential grade to be awarded. This provides transparency, prevents any sudden surprises and has the potential to significantly reduce the risk of appeals.
- It is reasonable to allow learners to appeal to their school on the grounds that their teacher made an error when assessing their performance. As set out in the JCQ proposed appeals process, each learner will have a pro forma which tells them which assessments their grade was based on. Learners could use this pro forma as the basis of an appeal to the centre about their grade before that grade is submitted to the board.
- We also need to consider 'errors' as being broader than marking errors, eg administrative errors like transposing the names of candidates or using the wrong mark from an assessment that has been sat.

- If the teacher judgement has been arrived at without using required quality assurance processes, this would be grounds for changing a grade by the exam board. Again, exam boards are not in a position to overrule the professional judgement of teachers.
- Given that centres are generating the marks this year it follows that the first stage of the appeals process is with them so that they can critically review their own decisions before AOs are involved. We have significant concerns about learners coming directly to boards with appeals based on claims that their centre has not followed exam board requirements. In the JCQ appeals proposal, it is envisaged that the first stage of a post-results appeal would be to the centre. If learners remained dissatisfied following that, they can appeal to the board.
- Grade protection is not mentioned in the consultation at the awarding body stage of the appeals process. Confirmation is needed that at all stages of the appeals process results can go down as well as up. This will go some way to managing down the volume of appeals (which we anticipate will be very high).

### **13. Private candidates**

- Any scenario in which private candidates are to complete the papers set by exam boards outside of usual examination centre arrangements, for example in their homes, would require a logistical capability of a scale and complexity that is beyond the capacity of current delivery arrangements. The sitting of standardised tests should be managed through centres – including the marking.
- We believe that the standardised assessment should be the baseline evidence for private candidates to be given a CAG by a centre, although we would advise that other evidence should be used whenever centres feel able to validate it or have the capacity to manage it.

#### **We recommended:**

- Ways must be found to incentivise mainstream centres, probably involving the DfE, to ensure that private candidates are not almost wholly reliant upon the limited numbers of distance learning providers registered as centres.
- Normal exams should not be provided solely for private candidates either in summer or autumn 2021 at a time when the decision to cancel exams has been taken.

### **14. Engagement with education**

- We believe that any time spent in education in Spring/summer 2021 should be focused on students' aspirations and planned progression routes and studying those areas which will help them most in their planned next stages of study or training, rather than spent on evidence-gathering activities or taking tests.