

Consultation on arrangements for an autumn 2021 exam series

HEQA's response

Question 1: To what extent do you agree or disagree that students who receive a teacher assessed grade in summer 2021 should be eligible to enter for the corresponding:

- GCSE exams in autumn 2021?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- AS exams in autumn 2021?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- A level exams in autumn 2021?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 2: To what extent do you agree or disagree that exam boards should be able to accept entries for the autumn exams from students who did not enter to receive a grade in summer 2021 but who, in the opinion of the exam board, would have entered for the summer 2021 exams had they taken place?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 3: To what extent do you agree or disagree that the autumn 2021 exams should be open to all students, regardless of any actual or planned intended entry in summer 2021?

- GCSEs

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- AS

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- A level

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 4: Do you have any comments on which students should be able to take exams in autumn 2021?

We are in favour of making exams (in any series, not just autumn 2021) as accessible to as many students as possible.

It is not clear how exam boards will be able to satisfy themselves that a given student "would have taken exams in 2021 had they not been cancelled", and it is likely to be impossible in some cases, since exams were cancelled long before entry deadlines. Cancellation of the summer 2021 series has severely disadvantaged many home-educated students, and excluding them from the autumn series if they cannot provide evidence about their intentions in the summer is likely to disadvantage them further.

In addition, the cancellation of exams and subsequent uncertainty about arrangements has affected many home educators' study plans. Those who are taking exams in Autumn will have to continue studying subjects for up to six months longer than planned, impacting on time they had planned for future studies. Open entries to the autumn exam series would allow home educators the most flexibility to adjust their plans to reflect the changed circumstances.

Question 5: To what extent do you agree or disagree that students entering GCSE, AS or A levels in autumn 2021 should be assessed on their performance in exams only?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 6: To what extent do you agree or disagree that students entering GCSE, AS or A level art and design should be assessed on their performance in an exam board set task only?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 7: To what extent do you agree or disagree that students' work in response to the art and design tasks should be marked by the exam boards?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 8: Do you have any comments in our proposal that, with the exception of art and design qualifications, grades should be determined by students' performance in exams only?

Question 9: Do you have any comments on our proposed approach to art and design qualifications?

We are in favour of exam board assessment rather than centre assessment, both for art and design and for other subjects, both in autumn 2021 and in all exam series. Centre assessment

places home-educated candidates at a disadvantage: it is difficult for centres to accommodate such students, and even where they are able to do so, they cannot assess students they do not know as effectively as students they know. Exam board assessment treats all candidates equally.

Question 10: *To what extent do you agree or disagree that students should be able to carry forward any grade for practical science and geology skills to the autumn 2021 series?*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 11: *To what extent do you agree or disagree that students should be able to carry forward any grade for spoken language in GCSE English language and modern foreign languages?*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 12: *Do you have any comments on our proposed approach to the separately reported grades for A level practical science and geology skills and for GCSE English language and modern foreign language spoken language skills?*

[No comments]

Question 13: *To what extent do you agree or disagree that the autumn exam papers should be in their normal form, in terms of:*

- *the number of exams per subject*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- *the style of the questions*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- *the format of the papers*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- *the conditions under which they are taken*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 14: To what extent do you agree or disagree that students should not be given advance information about topics that will be included in the autumn exams?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 15: To what extent do you agree or disagree that students taking autumn exams should only have access to the usual support materials when taking an exam?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 16: Do you have any comments on our proposals about the form of the autumn 2021 exams?

The key aim of this series is that students should have the opportunity to sit the exams they have prepared for, and as such neither teachers nor students should be given advance information about the content of the autumn exams. It is difficult to manage distribution of such information in a way that is fair to all students. The exam series should be as close to a regular series as possible in this respect. Furthermore, teachers should not (as in summer 2021) be given advance information about assessments that is not freely available to home educators.

Question 17: To what extent do you agree or disagree that:

- AS and A level exams should be held in October 2021 (with entries being required by early September)

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- GCSE exams should be held in November and early December 2021 (with entries being required by early October)

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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- GCSE English language and maths exams should be held later than usual?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 18: Do you have any comments on our proposals for when exams should take place?

The exams are too late to allow progression in most cases: they would have been far more useful had they taken place sufficiently early to support entry to college and university, or (since home-educators often apply post-qualification) applications for entry in 2022.

Question 19: To what extent do you agree or disagree that the usual arrangements for reviews of marking and appeals should apply to the autumn 2021 exam series?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 20: Do you have any comments on our proposal that the usual provisions for reviews of marking and appeals should apply in autumn 2021?

[No comments]

Question 21: To what extent do you agree or disagree that an exam board must, at the request of a student, reissue a certificate to show the better of the grades issued to a student in summer 2021 and autumn 2021?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 22: To what extent do you agree or disagree that an exam board should not reissue a certificate to show the better of the grades issued in summer 2020 and autumn 2021?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 23: Should we require or permit the exam boards to offer GCSE exams in autumn 2021?

Require	Permit
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Question 24: Should we require or permit the exam boards to offer AS exams in autumn 2021 or should we prohibit them from offering AS exams?

Require	Permit	Prohibit
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Question 25: Should we require or permit the exam boards to offer A level exams in autumn 2021?

Require	Permit
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Question 26: To what extent do you agree or disagree that, if we require exams boards to offer exams, we should lift this requirement for any subject for which there have been no entries by the entry deadline?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 27: Do you have comments on whether we should require or permit the exam boards to provide GCSE and A level exams in autumn 2021?

The introduction to the consultation says

Government policy is that students who want an opportunity to improve on their teacher assessed grades issued to them in summer 2021 should be able to enter GCSE, AS and A level exams in the autumn.

This policy aim cannot be achieved by leaving it up to exam boards whether to hold GCSE and A level exams. The only reliable way to achieve the aim is to require exam boards to provide exams in autumn 2021.

Question 28: Do you have comments on whether we should require or permit exam boards to provide AS exams in autumn 2021 or whether we should prohibit them from doing so?

The introduction to the consultation says

Government policy is that students who want an opportunity to improve on their teacher assessed grades issued to them in summer 2021 should be able to enter GCSE, AS and A level exams in the autumn.

This policy aim cannot be achieved by leaving it up to exam boards whether to hold AS level exams. The only reliable way to achieve the aim is to require exam boards to provide exams in autumn 2021.

The consultation text raises another argument for excluding AS levels from the autumn series: they are "not usually necessary for progression". This may be true for schoolchildren, but is not generally true for home-educated candidates, who may take unusual combinations of exams (e.g. a mixture of GCSEs, A levels and AS levels in the same year), and often take fewer exams overall, making the effect of exclusion from a particular exam more damaging. Furthermore, AS levels are important for university application, since they can stand in place of predicted grades for students who do not have teachers to provide predictions.

Finally, the consultation text notes that AS level entry numbers are low and says

we question whether the benefits of [including AS levels in the autumn series] would outweigh the additional costs.

This is a question worth asking, and it deserves a serious answer. In autumn 2020 there were 1925 AS level entries, representing around 500 student-years of preparation time (assuming 3-4 months of full-time preparation per entry). This is a reasonable estimate of the lower bound of the benefits, assuming that students entering for exams expected to achieve benefits at least as great as the efforts expended. Are the additional costs likely to exceed 500 years of person-time?

Question 29: To what extent do you agree or disagree that we should not require the exam board to offer AEA exams in autumn 2021?

Strongly agree	Agree	Neither agree nor	Disagree	Strongly disagree
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		disagree		
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Question 30: *To what extent do you agree or disagree that we should not introduce any rules about the submission of project qualifications in autumn 2021?*

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
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Question 31: *Do you have comments on our proposed approach to AEA and Project qualifications in autumn 2021?*

[No comments]

Question 32: *Are there any other aspects of the possible arrangements for the autumn exams that could have a possible negative impact on students because of their protected characteristics that we have not identified? If yes, what are they?*

It is important that there is a way for reasonable adjustments to be considered for new entries to the Autumn series, not just carried over from Summer arrangements. Some home educated students who suffer from SEND including ASD and anxiety will have decided in January that the uncertainty surrounding the summer arrangements was sufficiently damaging that they would not make an entry despite having originally planned to do so. These students should be able to sit in Autumn within a more familiar framework, but would not necessarily have access arrangements arranged with a centre.

Question 33: *How could any negative impacts be removed or mitigated?*

[No comments]

Question 34: *We have set out our understanding of the impact of our proposals on schools, colleges and exam boards. Are there any other potential impacts that we have not identified?*

Limiting entries to only those from the summer series (either entirely or through unknown mechanisms such as 'had intended to sit in summer') may lead to candidates needing to put in an entry for summer purely in order to defer it - this increases the burden of administration on exam centres (and in some cases boards) at a time when they are extremely busy with the summer 21 arrangements. Depending on timing this may also increase costs as late fees may be incurred.

Question 35: *Are there any additional steps we could take to reduce the costs or burdens of our proposals?*

The timing of the consultation is unfortunate: the outcome is likely to be announced after the summer private candidate entry deadline (26 April), making it impossible for candidates to make informed decisions about whether to defer. The burden on private candidates could be reduced by announcing the broad policy decisions before the private candidate entry deadline.