

# HEQA 2021 consultation response

A response to [Consultation on how GCSE, AS and A level grades should be awarded in summer 2021](#)

## 2 What the grades will mean

**1. To what extent do you agree or disagree that the grades awarded to students in 2021 should reflect the standard at which they are performing?**

[Multiple choice] Strongly agree

## 3 When teachers should assess the standard at which students are performing

2. To what extent do you agree or disagree that the alternative approach to awarding grades in summer 2021 should seek to encourage students to continue to engage with their education for the remainder of the academic year?

3. When would you prefer that teachers make their final assessment of their students' performance?

4. To what extent do you agree or disagree that teachers should be able to use evidence of the standard of a student's performance from throughout their course?

5. Should there be any limit on the period from which previous work could be drawn?

6. If you answered 'yes', what should that limit be?

**7. Do you have any comments on when students should be assessed?**

Assessments for all students should take place sufficiently early to allow progression, but no earlier than exams were due to take place. In order to avoid disadvantaging home-educated students, the assessment timetable for those students should be determined and published as early as possible, not left to the discretion of schools.

Home-educated students are particularly strongly affected by changes to assessment timetables because they prepare for exams at a wide variety of paces. In some cases, the preparation period for an exam is very compressed: it is not uncommon for home-educated students to spend only a few months (rather than the usual two years) studying a GCSE syllabus. If assessments are made earlier than exams were due to take place, these students will be disadvantaged, since their preparations will not be very far advanced.

## 4 How teachers should determine the grades they submit to exam boards

8. To what extent do you agree or disagree that the exam boards should provide a set of papers to support teachers in assessing their students' work?

9. Do you think the use of the papers provided by the exam boards should be compulsory or optional, for GCSEs, AS and A levels?

**10. To what extent do you agree or disagree that any papers provided by the exam boards should include questions that are of a type that is familiar to students?**

[Multiple choice] Strongly agree

**11. To what extent do you agree or disagree that if teachers use exam board papers they should have choice about the topics covered in the questions their students answer, for example through choice of which papers they use with their students from the set of papers provided?**

12. To what extent do you agree or disagree that teachers should be required to assess (either by use of the exam board papers or via other evidence) a certain minimum proportion of the overall subject content, for each subject?

13. To what extent do you agree or disagree that teachers should mark any papers their students are asked to complete?

**14. Do you have any comments on the use of exam board papers?**

We have two comments, on whether questions should be of a familiar type, and on choice of topics.

On the type of questions: If the papers that the exam boards prepare for teachers to use are also used by private candidates then it is important that questions be of a familiar type.

Many home-educated students rely heavily on past papers to prepare for exams, and do not have access to the additional materials that exam boards provide to teachers. In 2021 it is proposed that exam boards engage closely with schools and colleges; again, it is unlikely that home-educated students will have access to this process. If the type of the questions used in the papers provided by exam boards is unfamiliar, a major source of information used by home-educated students to prepare for assessment will no longer be available, disadvantaging these students.

On choice of topics: If teachers have discretion in selecting topics on which papers to use, those papers will be less useful for assessing private candidates. If private candidates have the same discretion, they will have an advantage over schoolchildren (since teachers, not students, will make the choice in schools). If private candidates do not have the same discretion, they will be disadvantaged, since they will be obliged to cover the whole syllabus, while schoolchildren can focus their preparation on a few topics. This is one of several reasons why repurposing the "externally-set papers" for use by private candidates will not work well.

Unfortunately, it is impossible for us to answer question 11 without information about how private candidates will be assessed, because our answer depends on that information.

15. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in full for a subject?
16. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in part for a subject?
17. To what extent do you agree or disagree that teachers should mark their students' non-exam assessments?
18. To what extent do you agree or disagree that the marking of non-exam assessments should not be moderated by the exam boards this year?
19. Do you have any comments on the use of non-exam assessment and separately reported results and grades?
20. To what extent do you agree or disagree that a breadth of evidence should inform teachers' judgements?
21. To what extent do you agree or disagree that the provision of training and guidance from exam boards should support teachers to reach their assessment of a student's deserved grade?
22. To what extent do you agree or disagree that teachers should be able to take into account other performance evidence for a student before submitting a grade?
23. To what extent do you agree or disagree that performance evidence from closer to the time of the final assessment, should carry more weight in determining a student's final grade?
24. Do you have any comments on the use of other performance evidence?

## 5 The assessment period

25. To what extent do you agree or disagree that all students should be assessed within a given time period for each subject – whether or not their school or college must or is using exam board papers?
26. To what extent do you agree or disagree that exam boards should publish all of their papers shortly before the assessments in order to manage the risk of some students being advantaged through papers being leaked?

### **27. Do you have any comments about the assessment period for the use of exam board papers or teacher devised assessments?**

The proposed assessment period will affect home-educated candidates in several ways.

First, since home-educated students prepare for exams at a wide variety of paces, changes to the timetable are likely to disrupt their preparations and disadvantage the students. (Please see our answers to Section 3.)

Second, since some home-educated candidates have to travel considerable distances to take exams, any timetable that requires them to attend exam centres more often will introduce new challenges, additional costs and increased risk of exposure to the coronavirus.

## 6 The conditions under which students should be assessed

28. To what extent do you agree or disagree that the assessments should, if possible, be taken within the student's school or college?

**29. To what extent do you agree or disagree that if the pandemic makes it necessary a student should be able to take their assessments at an alternative venue, including at home?**

[Multiple choice]: Strongly agree

**30. Do you have any comments on the conditions under which students should be assessed?**

However private candidates are assessed, it is important to accommodate both those who need to stay at home due to the pandemic and those who cannot take remotely-invigilated assessments (e.g. due to special needs, or lack of reliable internet connection).

## 7 Supporting teachers

31. To what extent do you agree or disagree that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements?

## 8 Internal quality assurance

32. To what extent do you agree or disagree that the exam boards should set requirements for school and college internal quality assurance arrangements and should provide guidance on these requirements to support centres?

33. To what extent do you agree or disagree that the head of a school or college should make a declaration to the exam board confirming its requirements had been followed and teachers had regard to the guidance and support materials provided?

34. Do you have any comments about internal quality assurance?

## 9 External quality assurance

35. To what extent do you agree or disagree that the exam boards should quality assure how schools and colleges are determining grades?

36. To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

37. To what extent do you agree or disagree that the exam boards should sample, at subject level, the evidence on which the submitted grades were based?

38. To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

39. To what extent do you agree or disagree that exam boards could only change a student's grade after a review of the evidence and discussion with the school or college?

40. Do you have any comments about external quality assurance?

## 10 How students could appeal their grade

41. To what extent do you agree or disagree that students should not be told the grade their teacher has submitted before results day?

42. To what extent do you agree or disagree that students should be able to appeal their grade on the grounds that their teacher made an error when assessing the student's performance?

43. To what extent do you agree or disagree that the school or college should consider the appeal?

44. To what extent do you agree or disagree that the appeal should normally be considered by a competent person within the student's school or college who was not involved with the original assessment?

45. To what extent do you agree or disagree that a school or college should be able to appoint a competent person from outside of the school or college to consider the appeal?

46. To what extent do you agree or disagree that a grade should only be changed if it is found not to represent a legitimate exercise of academic judgement?

47. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not

48. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not properly consider the student's appeal?

**49. To what extent do you agree or disagree that we should seek to bring forward results day(s), in order for appeals to begin earlier?**

[Multiple choice] strongly disagree

50. To what extent do you agree or disagree that if results day(s) are brought forward, we should seek to decouple when a student is informed of their results, and universities are informed of their formal result for the purpose of admissions decisions?

51. To what extent do you agree or disagree that the exam boards should provide information for schools and colleges on how they should handle appeals?

**52. Do you have any comments on the proposed appeal arrangements?**

We are concerned that adjustments to the timetable to accommodate appeals will involve changing assessment dates, which would disadvantage home-educated students, as we have outlined in responses to earlier questions.

## 11 Private candidates

**53. To what extent do you agree or disagree that private candidates should be able to complete the papers set by exam boards, with them marked by the exam boards?**

[Multiple choice] disagree

**54. To what extent do you agree or disagree that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college's other students?**

[Multiple choice] strongly agree

**55. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?**

[Multiple choice] strongly agree

**56. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021?**

[Multiple choice] neither agree nor disagree

**57. Do you have any comments on the options for how grades should be made available to private candidates?**

We have provided a document to Ofqual and the DfE with an analysis of the proposals for assessing private candidates:

Assessment options and home education: Notes on the 2021 exam consultation  
Home Educators' Qualifications Association, 20 January 2021  
<https://heqa.uk/files/assessment-options-and-home-education.pdf>

We provide a high-level summary here, and refer the reader to the document for more details.

First, there is no single approach that will work for all private candidates. For a few, who are unable to leave their homes due to the pandemic, and who cannot take remotely-invigilated exams (e.g. due to special needs or lack of a reliable internet connection), exams cannot be made to work.

Second, assessment of evidence via schools or colleges cannot be made to work for many home-educated students. There are several insurmountable obstacles:

(a) many home-educated students do not have portfolios of work, e.g. because they prepare orally

(b) many home-educated students prepare at unconventional paces and so have no evidence available even fairly shortly before exams

(c) the majority of home-educated students have no tutors for some subjects, and so there is nobody sufficiently familiar with their work to assess them

as well as a number of additional challenges (such as costs) detailed in our document. However, we support allowing teacher assessment for private candidates in the cases where it is possible.

Third, assessment via exams can be made to work for most. Home education is very diverse, and this diversity is reflected in the wide variety of approaches used to prepare for exams. Running exams for private candidates will support all of these approaches; any other method of assessment will necessarily disadvantage some home-educated students.

Fourth, repurposing the papers prepared for teachers as a means of private candidate assessment can be made to work to an extent. However, it appears to have no advantages compared to exams (besides a superficial similarity to the assessment used for schoolchildren) and has several serious drawbacks:

- (a) without access to the support and training that exam boards will provide to teachers, home-educated students will be less able to prepare for assessment
- (b) if teachers have discretion in which papers to use and home-educated students do not, the latter will be disadvantaged
- (c) many home-educated students rely heavily on past papers for reliable measurement during preparation, since they do not have teachers to assess and guide them. Any deviation from the usual exam format makes the use of past papers less effective
- (d) many of the mechanisms in place to support exams, such as access arrangements, do not have clear analogues in the proposed system of reusing papers designed for teachers

Fifth, while an autumn exam series would slightly lessen the damage if no workable solution for private candidates is available in the summer, the timing of the proposed autumn series does not support progression to college or university.

**58. If the preferred option for private candidates is an exam series, should any other students be permitted to enter to also sit an exam?**

HEQA does not have a view on the assessment of schoolchildren.

It would be inappropriate for us to seek to restrict the options available to schoolchildren, just as it would (for example) be inappropriate for the Association of School and College Leaders to lobby for restrictions on the assessment of home-educated students.

## 12 Whether Ofqual should prohibit the taking of GCSE, AS and A level exams in England, the UK and elsewhere in the world

**59. Should the exam boards be prohibited from offering GCSE, AS and A level exams in any country in 2021?**

[Multiple choice] No

**60. If you answered no, which students should be allowed to enter for them?**

[Multiple choice] Any student who wishes to take exams

## Equality impact assessment

61. Do you believe the proposed arrangements (any or all) would have a positive impact on particular groups of students because of their protected characteristics?

62. If you have answered 'yes' please explain your reason for each proposed arrangement you have in mind.

**63. Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected characteristics?**

[Multiple choice] Yes

**64. If you have answered 'yes' please explain your reason and suggest how the negative impact could be removed or reduced for each proposed arrangement you have in mind.**

A disproportionate number of home-educated students have special educational needs. It is likely that uniformly replacing exams, which have several mechanisms for accommodating those students, with any other system, will disadvantage those students unless extraordinary care is taken. For example,

(a) many home-educated students require access arrangements, which involve a costly assessment for each centre and each exam. Any replacement system will need to duplicate this assessment, introducing additional costs.

(b) a disproportionate number of home-educated students suffer from poor physical health. It is likely that many such students will be classified as extremely clinically vulnerable to COVID-19, and any requirement for them to travel is likely to put them at risk.

(c) a disproportionate number of home-educated students have mental health problems and are particularly vulnerable to uncertainty and change.

The negative impact on these students can be reduced by early decisions that remove uncertainty, a choice of exam assessment and centre assessment for private candidates, and extended deadlines for access arrangements.

## Regulatory Impact Assessment

65. Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above? If yes, what are they?

66. What additional costs do you expect you would incur through implementing the proposed arrangements on which we are consulting?

67. What costs would you save?

68. We would welcome your views on how we could reduce burden and costs while achieving the same aims.