

Technical Consultation – The General Awarding Alternative Framework

Your data and rights

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Condition GQAA1: Application, interpretation and definitions

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| Do you have any comments on proposed Condition GQAA1? |
| <p>These arrangements create a system very different to the normal exam procedures, with considerable disruption to everyone concerned. If this framework is not time limited it produces uncertainty about the validity of future exam preparations. Policy decisions should be explicitly made about any adjustments to future exam series, not created through allowing 2021 arrangements to remain in place beyond the period in which they have been considered and consulted on. Therefore the alternative awarding framework should have a set time period, possibly ending with the autumn exam series.</p> <p>We agree with the definition of a Private Candidate. This response is specifically considering home educated young people taking exams. The majority of these will do so in a situation where they are Private Candidates, though some may have had more of a relationship with a Relevant Centre, and be considered as internal Learners.</p> |

Condition GQAA2: Assessments under the GQAA Framework

Do you have any comments on proposed Condition GQAA2?

There is no definition of the term 'examination', and there is quite an overlap in perception between the terms 'examination' and 'controlled assessment'. As such introducing a formal clause forbidding 'assessment by examination' may lead to unforeseen consequences and misunderstandings, such as arguments that controlled assessments (likely to be a key part of many centre's assessment plans) should not be allowed. Indeed for many home educated young people who have not been working with a centre or other established educational provider, controlled assessments will be the main or only evidence that can easily be provided to a centre for them to suggest appropriate grades.

The provision of arrangements for Teacher Assessed Grades instead of the normal procedures should be sufficient to ensure that a standard exam series does not take place.

This clause is also subject to the concerns raised in the response to question 1. If this clause is left to apply until rescinded it risks making a key policy decision (the cancellation of further exams) without appropriate consultation. This risk is avoided if the clause is time limited to only apply to this summer.

Condition GQAA3: Results for GQ qualifications

Do you have any comments on proposed Condition GQAA3.3 in relation to guidance for centres?

The terms "effective guidance" and "clear and effective arrangements" are subjective. The timescales here are also not clear. For home educated young people sitting as Private Candidates in particular, decisions about whether a centre can support a candidate, or whether a candidate should be entered in the summer series or defer to a later series, cannot be made until the details of what assessments will be acceptable are known. Guidance provided when it is too late to use it is worthless. There ideally needs to be a fixed timescale in which detailed guidance is provided, or at least a requirement that it be done so in a timely manner.

Condition GQAA4: Appeals

Do you have any comments on proposed Condition GAA4 in relation to guidance?

Section GQAA4.11(c) states that guidance will be provided on the evidence that will be considered by the awarding organisation in an appeal. In the case of home educated young people, it needs to be clear whether this may include evidence available to but not selected by the exam centre (for instance work that the candidate has supplied showing a high academic standard that the exam centre decides not to accept for some reason, which may be the basis for the appeal). It also needs to be specified what evidence the exam centre needs to store in case of an appeal and for how long.

The Proposed GQAA3.2(a)(i) Requirements

Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to Teacher Assessed Grades?

Where separate endorsements need to be provided (eg for A level science practicals and GCSE English and MFL speaking endorsements), these may be difficult to achieve for home educated young people. There needs to be an option to state that these couldn't be completed or verified in some circumstances (distinct from being completed but awarded at a lower or unclassified grade).

This situation has been dealt with in other qualifications such as the CAIE international qualifications by allowing a component exemption, to be awarded where a student or group of students has been unable to complete the practical component due to Covid-19 disruption. This exemption needs to be requested from the exam board. It could also be considered as applicable across a group of candidates, for example all Private Candidates, and available to other groups or individuals on request.

Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to additional assessment materials?

“an awarding organisation should encourage a Centre using Additional Assessment Materials to deliver any assessment based on them on the same day to all of its Learners taking the relevant GQ Qualification where the same questions or tasks are used.”

This precaution makes sense for pupils in a school who have close relationships and may share answers; it has no relevance for home educated candidates who are entered through the same Centre as Private Candidates but have no relationship to the internal Learners. If Centres feel they have to meet this requirement for home educated Private Candidates it could disadvantage those candidates (and be more difficult for the Centre) through artificially restricting timings. Private Candidates should be explicitly excluded from this statement.

Any materials that are available to schools in order to prepare their Learners for assessments should also be available to the Teachers of home educated candidates - ie their home educating parents and private tutors. If Teachers of internal candidates can both select appropriate assessment resources and have access to preparation material specifically for those resources, and Teachers of home educated candidates can not, then home educated candidates will be unfairly disadvantaged.

Centres may also not have sufficient expertise to set and mark assessments for some qualifications taken by Private Candidates (including pupils registered at a school sitting subjects they have prepared for outside of the school environment, such as heritage languages). This is a particular problem for home educated candidates who frequently sit exam-only subjects at centres with no subject and/or board specific knowledge of that qualification.

In order for guidance to be sufficient it should include examples of entire assessment suites and optional marking services. For this to be useful, this needs to be known upfront so that Centres can be confident they will be able to support these requirements and make entries for home educated students sitting as Private Candidates. Optional marking services and examples of entire assessments provided by exam boards will significantly reduce the burden on exam centres and so make it more feasible for centres to be able to grade home educated students.

Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to internal quality assurance?

There may need to be a different internal quality assurance process for Private Candidates to that of the Centre's internal Learners, due to the differing circumstances of prior knowledge and learning conditions. This should be explicitly mentioned so that Centres feel comfortable with differing procedures.

Do you have any comments on proposed the proposed Condition GQAA3.2(a)(i) requirements in relation to external quality assurance?

Similarly there are likely to be different policies appropriate for Private Candidates (including home educated students) to those for internal Learners, and this should be explicitly stated. In particular, if adjustments to judgements are required for evidence supplied by a home educated Private Candidate, it will not generally be appropriate to apply this to the evidence from internal Learners.

Proposed document for Heads of Centre, Heads of Department and teachers on the submission of Teacher Assessed Grades

Do you have any comments on our proposed document: 'Information for heads of centre, heads of department and teachers on the submission of teacher assessed grades: summer 2021', in relation to standards in 2021?

Document introduction -

“These grades should be based on a range of evidence completed as part of the course,”...

“The grades submitted to exam boards must reflect a fair, reasonable and carefully considered judgement of the student’s performance across a range of evidence, on the curriculum content that they have been taught.”

For home educated candidates, consideration should be given to the fact that in order for a judgement to be fair, it may need to be based on a more compressed amount of evidence than would typically be available for internal candidates.

“Where centres have taken on private candidates, they should generally be excluded from such comparisons.”

It is very useful to make this explicit.

Standards in 2021 - It is stated clearly that the level a student is working at should be judged at the same standard as previous years, taking into account the content coverage of individual students. However there is a significant disparity between standards in 2019 and earlier and in 2020, as evidenced by the grades awarded and by the mark boundaries of exam papers set in 2019 compared to 2020. This needs to be addressed explicitly, and guidance given as to which set of standards should be considered comparable.

For example, if an internal student is judged to the 2020 standards (which would seem likely as these were based on a similar system of teacher assessment), but a home educated private candidate is judged based primarily on a 2019 past paper marked to the 2019 grade boundaries, this will be unfair to the home educated private candidate. If the 2019 grade boundaries should be considered more generously to match the 2020 standards and reflect the more difficult circumstances of learning over the pandemic period, this needs to be stated. Similarly guidance needs to be given on the treatment of mock papers which have already been sat and marked to that year’s standards - students would receive unfair results depending on whether they sat a 2019 or 2020 paper.

Do you have any comments on our proposed document: 'Information for heads of centre, heads of department and teachers on the submission of teacher assessed grades: summer 2021', in relation to sources of evidence (private candidates)?

“Private candidates should be assessed in a similar way to other students, using a range of evidence.” ... where this is available.

“Where a centre accepts private candidates, exam boards will expect centres to provide to private candidates a description of the main elements of their approach to assessment before they register with them.”

Many home educated private candidates will already have been registered with an exam centre before these arrangements were considered, often at considerable cost as exam centre options were already

narrowed after 2020. They are therefore already tied into a contract stating fees to be paid if entries are withdrawn, and now face additional costs to comply with the extra work of setting and marking suitable assessments or verifying existing evidence. Home educated private candidates do not have a free choice over whether these arrangements are suitable as in many cases they face both losing the fees already paid and being charged additional late fees to enter at a new centre. The later the timescales, the higher the fees and fewer options that are available, so home educated private candidates needed to make decisions already, based on the incomplete information that was available.

These are all private exam centre contracts reflecting the work the centre now has to do that it was not originally expecting to have to provide. While awarding organisations are being lenient in their fees (which is welcome) this is a small proportion of the costs. The only realistic way to reduce the overall cost burden to home educated private candidates is to reduce the extra work required by the exam centres, and to make it clear how this can be achieved, as soon as possible. This will still be too late for most, but it will go some way towards restoring confidence in centres accepting home educated private candidates in the future.

Additionally, although exam centre fees are generally outside of Ofqual and the Awarding Organisations' control, attempts should be made to ensure there are options for either

- fee-free deferral to a later exam series, or
- low cost transfers to supporting centres, where the exam centre a candidate is registered with can no longer support them or offers a grading process that the candidate feels is not suitable for their needs.

“including the fact that the centre often will not already have previous evidence on which to base a judgement.”

This should be emphasised more strongly, to state that centres should not require previous evidence from a home educated private candidate, although they may use such evidence where it is available.

“Boards will also provide guidance on potential combinations of evidence that could be used for a specific subject. In all cases, the head of centre will make sure they have collected sufficient evidence to ensure that they are able to confirm that the grades are a true representation of student performance. Exam boards will produce further guidance that assists those centres that may wish to determine grades for private candidates in doing so.”

This level of guidance is needed before centres can decide whether to accept candidates and what is a reasonable amount to charge them. In particular, they need to know the minimum scope of centre assessments that they will be required to set and mark (what is likely to constitute 'sufficient evidence'), and whether assessment setting and marking support will be available for subjects in which they have no in-centre expertise.

As a typical examination based assessment for GCSE is 3 hours of focused work, this could be a standard baseline for centres to work to. Without a guideline, some centres feel they need to charge for tutors to work with home educated students for long periods of time in order to gather sufficient verified evidence, or for candidates to produce large amounts of work that they may not yet have available in a suitable form (eg 10 marked assignments across the course). If in fact a smaller number of timed assessments would be acceptable, it would be enormously helpful to have this stated explicitly.

Centres also need clear guidance on what is the minimum sufficient evidence they need to collect and store against the possibility of appeals, and for how long they need to store this.

Access arrangements - guidance is required on how centres should handle access arrangements for private candidates, especially where a transfer has been made between centres at a late stage as the existing centre where access arrangements had been agreed was unable to support a candidate. Many centres have cut off dates (already past) and cannot accommodate access arrangement requests that come in after this point, as there is usually a long process that needs to be completed by each centre to exam board requirements in order to show that access arrangements are required. Usually these arrangements cannot be transferred between centres.

Explicit guidance needs to allow for centres to make their own judgements about what access arrangements are suitable in the case of any controlled assessments taken as part of the centre grading process (for example, extra time applied to a past paper assessment). This may make reference to arrangements that were in place at a previous centre, or to other evidence of requirement that the centre chooses to accept - but given the timescales and different evidence base this year these should not require external reports.

Do you have any comments on our proposed document: 'Information for heads of centre, heads of department and teachers on the submission of teacher assessed grades: summer 2021', in relation to internal sign-off within the centre?

“Each grade for a subject must be signed off by at least 2 teachers in that subject, one of whom should be the head of department or subject lead. Where there is only one teacher in the subject or department, or only one is available, the head of centre should be the second signatory.”

It may be the case that there are *no* teachers of a subject at a centre, for some Private Candidates (particularly home educated candidates, but also including heritage language or extra curricular subjects for pupils normally attending a school). A process needs to be determined for grades to be signed off in this instance.

Options might be for a centre to have a designated Private Candidate support person to sign alongside the head of centre, or for the exam boards to provide additional external quality assurance in this instance.

Head of Centre sign-off -

“- I am satisfied that each student’s grade is based on an appropriately broad range of evidence, and is their own work
- exam board requirements have been met for any private candidates”

There may be a different breadth of evidence base between internal students and Private Candidates, in order to be fair to both groups. The guidance needs to be clear that if exam board requirements have been met for Private Candidates, that is sufficient for the declaration, even if the processes have been different for internal candidates.

“- access arrangements and reasonable adjustments were provided with appropriate input from the SENCo and other specialists (and where they were not, that has been taken into account)”

As stated above, explicit guidance needs to be offered on the handling of access arrangements for home educated private candidates who have had to register with a centre at a late stage due to the change in arrangements. These students will not have had the normal way of working assessments completed but still need access arrangements for any assessments undertaken to ensure they are not at a disadvantage due to their disabilities.

Proposed document: Information for centres about making objective judgements

We are seeking views on the proposed ‘objectivity guidance’ – as set out in Annex E: Information for centres about making objective judgements. We are not seeking views on the underlying policy decisions, which we explained in our analysis and decisions documents and which are now settled. Do you have any comments on our proposed document: ‘Information for centres about making objective judgements’, in relation to objectivity in grading judgements ?

All the comments about objectivity apply to home educated candidates. However these are also enhanced by a lack of prior knowledge of performance, and a potential lack of understanding of the home educated candidate’s learning process which may differ considerably from the process of a typical school student.

Guidance needs to include the fact that home educated candidates often learn in different contexts and formats and may not have a pre-existing range of evidence in the format a schooled student might. This does not indicate a lack of preparation or knowledge, which may have been achieved in less formal ways. Preparation may also normally be skewed towards the immediate pre-exam period, and therefore assessments taken earlier than the expected timescale may not fully reflect the candidate’s skills.

Do you have any comments on our proposed document: 'Information for centres about making objective judgements', in relation to unconscious effects on objectivity?

Consideration also needs to be given to the fact that home educated candidates may be being assessed in unfamiliar settings and under different conditions to internal candidates. For instance, they may use a smaller number of higher-stakes assessments than are available for internal candidates. These may be sat in unfamiliar conditions compared to a normal classroom setting, so although the test is the same the conditions are not. In-person assessments may be made by a stranger rather than a teacher the candidate already has a relationship with, which may affect performance. These differences will have a different effect on individual candidates, particularly those with SEND. Issues such as anxiety around an unfamiliar situation should not be confused with a lack of knowledge and skills.

Do you have any comments on our proposed document: 'Information for centres about making objective judgements', in relation to using previous data to check on the objectivity of judgements being made?

Any previous data will not normally be available or appropriate to use for home educated candidates.

Equality impact assessment

Do you consider there are any equalities impacts arising from our technical proposals which we have not previously identified?

Home educated candidates who require access arrangements will require centres to have reference to explicit guidance to ensure they are not disadvantaged.

Your details

Which nation or country are you based in?

England

How did you find out about this consultation?

Other (please specify):

Prior stakeholder engagement with Ofqual

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

Your details (official response)

Which of these options best describes your organisation?

Other representative or interest group

Your details (representative group)

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|--|
| Type of representative or interest group |
| Other |

Confidentiality

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| If there is any part of your response that you wish to remain confidential, please indicate below. Where you have requested that your response or any part remains confidential, we will not include your details in any published list of respondents. However, we may quote from the response anonymously in order to illustrate the kind of feedback we have received. Do you wish any part of your response to remain confidential? |
| No |