

# Contingency arrangements: GCSE, AS, A level, Project and AEA

Consultation response from the [Home Educators' Qualifications Association](#)

13 October 2021

## High-level points

- The contingency proposals are designed for schools; they do not adequately meet the needs of the thousands of home educated students who prepare for exams each year.
- The proposed evidence list is unsuitable for home educated students because it is based on the assumption that students are taught in the centres where they take their exams.
- The proposals are based on unrealistic ideas of centres' capabilities. Experience in 2021 shows that many exam centres are unwilling to create bespoke tests for private candidates.
- Exam centres cannot mark work for specifications they do not teach, and will be unable to accommodate home educated students who study for specifications rarely taught in schools.
- In some areas of England there were no exam centres available to home educated students in 2021. Replacing exams by teacher assessments again will produce a similar effect in 2022.
- Since teachers will both select test materials and prepare their own students for those tests, the proposals will produce further school grade inflation, disadvantaging home educated children.

## Responses to specific questions

### The evidence used to assess students' performance

**Question 2** *Are there any parts of the guidance which you think could be improved? Please be specific about which element of the guidance (a – m) you are referring to.*

The proposed guidance is far too vague to serve as a basis for preparation. It is unclear how soon the guidance will be finalised, whether private candidates need to find centres immediately, what centres will have to do to support private candidates, what assessments private candidates will have to prepare for, and how much evidence will be needed.

On the specific elements:

b) (assessment opportunities) is unworkable for home educated candidates. The nature of home education means that students study individually-tailored curriculums at individually-chosen speeds. It is not realistic to expect exam centres to create assessments throughout the year that cater to the needs of these students

d) (assessment conditions) suggests that assessments have to be taken in exam halls or classrooms. The guidance should make clear whether they can be conducted remotely where necessary.

e) (content to be assessed) has been designed with schools in mind. For private candidates it requires centres to construct bespoke assessments for individual students, which is an unrealistic expectation, as experience in 2021 shows.

f) (assessment time) does not provide any useful guidance. If there are upper or lower limits on the total assessment time, the guidance should state what those limits are. A similar lack of clarity in the Government's arrangements in 2021 led to a huge variety in the amount of assessment for private candidates. Some were subjected to several times the amount of assessment of a regular exam series, while others (even in the same exam centre) were awarded grades on the basis of less than a single full assessment.

i) (reasonable adjustments) assumes that the reasonable adjustment is already agreed and in place. However, home educated candidates accessing a new centre may not have reasonable adjustments agreed early in the academic year, and so they will not be able to access ongoing assessments as proposed.

j) (disruption) has been written for schools, and is not appropriate for home educated candidates, who may not be able to access assessments for reasons unrelated to disruption to education. The guidance should make clear under what conditions centres should collect additional evidence for private candidates, and what form that evidence should take. In practice, there is unlikely to be any such evidence available for a substantial proportion of home educated candidates, since most study without teachers or tutors, and so the guidance should also explain how those students should be awarded reliable grades if it is not possible to conduct exam-like assessments.

**Question 5** *Do you have any comments on the support exams boards should provide to teachers determining TAGs should they be needed in 2022? Please be specific about any additional support you think should be provided.*

Exam boards should produce new unseen resources to be used for assessment purposes only, allowing past papers to be used for preparation. In 2021 once it became known that grades would be awarded based on past papers, those papers were circulated widely. Furthermore, teachers have privileged access to past papers and can use that access to prepare their own students (whether deliberately or simply based on what they inevitably remember about the topics that will be tested), while home educating families do not, putting home educated students at a substantial disadvantage.

Exam boards should also offer a marking service to improve consistency, provide quality assurance and reduce the burden on teachers. Without such a service, many centres will be unable to assess home educated candidates who study for specifications not taught at those centres, and even centres that are able to assess are likely to be unwilling, due to the additional marking burden.

## **Contingency arrangements for private candidates**

**Question 10** *Do you have any comments on how arrangements from 2021 could be improved in order to better provide access to TAGs for private candidates?*

The section on private candidates seems to have been written in haste, and shows little understanding of the circumstances of those students. Private candidates do not generally want to "access the TAG process"; they want to receive reliable grades, consistent with the standards for the series, for the qualifications that they are studying for. Furthermore, as we have explained above, the proposed guidance is not appropriate for home educated children.

The guidance should make clear when private candidates will be able to access assessments, how much evidence will be required, what kind of evidence will be acceptable, whether tutors will be involved, and how candidates can be confident that their grades are reliable.

The experience of the last two years shows that it is unrealistic to expect the Department for Education and Ofqual to work with private candidates as proposed.

The key to providing better access to reliable grades for private candidates is to arrange for the exam boards to offer a marking service. Exam board marking will reduce the burden on centres, ensure consistency across centres, and allow centres to assess home educated candidates for specifications not taught at those centres.

## Quality assurance

**Question 12** *Do you have any comments on how schools and colleges should quality assure TAGs in 2022 (should they be needed)?*

The proposals are not conducive to quality assurance in general. They are particularly unsuited to quality assurance for the grades awarded to home educated candidates.

There is no reasonable way for schools and colleges to effectively quality-assure teacher-assessed grades for home educated candidates. Teacher assessment makes it inevitable that the grades that a home educated student is awarded will depend on the centre where the assessment is conducted.

## Equalities impact assessment

**Question 25** *Do you believe the proposed arrangements (any or all) would have a negative impact on particular groups of students because of their protected characteristics?*

Yes

**Question 26** *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.*

The reduction in exam centre availability resulting from the proposals will have a negative impact on home educated candidates with limited mobility, who may be obliged to travel substantial distances at short notice.

The release of large amounts of information late in the process will have a negative impact on home educated children with special educational needs.

The condensing of assessment for private candidates into a short period will disadvantage those candidates, particularly those with disabilities who may find the assessments physically, mentally and emotionally demanding.

The condensing of assessment for private candidates also introduces the risk that it will take place during a lockdown, placing candidates with health conditions that require shielding at a disadvantage.

## Innovation and growth

**Question 27** *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?*

For home educating families there are additional burdens associated with understanding the guidance, identifying centres, and disrupting their education plans to accommodate centre requirements for assessments.

**Question 30** *We would welcome your views on how we could reduce burden and costs while achieving the same aims.*

The burden on home educating families would be reduced by dividing responsibility between exam centres and exam boards as in a usual year, where exam centres invigilate and exam boards mark papers and determine grades. If exam boards mark assessments for home educated candidates then exam centres will be willing and able to accommodate those candidates, as they did up to 2019.