

Cambourne Village College Response to Consultation January 2021

In summary, our concern is this:

As a means of formal assessment, exams offer a degree of parity, reliability and objectivity. This is because: all students sit the same exams in the same conditions (with appropriate access arrangements, externally agreed); there is a high level of secrecy around the contents of the test, so that teachers have to teach the full breadth of the course; marking is external and therefore not subject to bias, and is rigorously moderated.

However, exams also suffer from significant flaws as a model for finding out what students know and can do. They are limited in their scope; they encourage teaching to a test; they advantage students who cope well in exam conditions; they overlook very many important capabilities that children display in other circumstances and that in themselves may be better indicators of knowledge, understanding and ability, and better predictors of future success. Exams are also based on the assumption that all candidates have had the same opportunity to learn the prescribed body of knowledge from which questions will be drawn.

What the government and Ofqual are proposing is, rather than redesigning an assessment system that would overcome the limitations of the exam system, to hold onto the concept of exams but without the critical elements that exams have to recommend them. Consequently, we are left with the worst of all possible worlds – a system that will be deeply unfair, insufficiently moderated, and giving no reliable indication of students' knowledge base or capability.

Some specific concerns:

Q1 – Reflecting the standard at which pupils are performing:

In assessing what a child knows / can do – this might be heavily dependent on the context in which they are expected to demonstrate this.

The differential learning loss referred to – is this properly accommodated in this proposal? How will a balance be struck in terms of the amount of content being assessed? What is the key content of each course that will ensure that 'progression' isn't limited, and who is determining this?

Q2-7 – Time-scale for assessment:

Concerns about the context in which work done previously, that could be taken into consideration, had been completed – how will this create a level playing field?

Concerns about the period over which the assessments are completed, for the impact on students.

Concerns about staff workload in trying to assess, moderate, make judgments, and then the period of external moderation that would necessarily follow this in order that it be rigorous.

Q8-14 – Use of exam-board papers

Concerns that essentially this becomes a set of exams, but without all of the arrangements that make them fair (which is essentially the key feature to recommend them as a process).

Concerns that teacher choice over questions may mitigate against the desire to teach the breadth of course content that was earlier considered desirable.

Concerns that teacher marking will be hugely onerous and also factor in bias – but the alternative is essentially mimicking a full exam process, but with leaked questions and unfair access arrangements.

Concerns that students may already have attempted past paper questions – not sure what is to be gained by these being included.

Q15-19 – Non-exam assessments

Concern that moderation of teacher marking is being axed – why? This undermines any confidence in these grades being fairly awarded.

Significant concerns about fairness here. The disruption to learning has been so significant and so different for different children – so the idea that the weighting of a non-examined assessment could be differently apportioned but also still give a clear indication (as outlined in Q1) about what a child knows / can do, doesn't follow.

Q20-24 – Other performance evidence

The proposal that “teacher-devised assessments should be used at the same time as the exam board papers, to avoid any students being unfairly advantaged or disadvantaged by the timing of when they are assessed” raises two issues:

1) what then is the difference between exam board assessments and teacher-devised assessments, and why would both be provided if they are being undertaken at the same time?

2) If the timing is seen as conferring advantage or disadvantage, then the notion of drawing on mock exams is problematic

Drawing on mock exam results raises issues about grade boundaries. For instance, it is already very clear that November 2020 exams had significantly lower grade boundaries in English and Maths. Centres drawing on mock exams with these papers and boundaries will be able to grade students far more generously, and therefore we will not have a like-for-like comparison.

Suggesting that “substantial candidate work (which relates to the qualification specification, and where the school or college are confident it was completed without support)” is essentially saying that only mock exams are, in the main, reliable sources – it excludes all homework for example.

Q.25-27 – The assessment period

This acknowledges that students will have prior knowledge of the assessment questions. This will still result in an unfair differential for students in terms of who is able to access teaching specifically driving towards these questions. This therefore makes comparison within and between centres problematic.

In some subjects, the fact that answers can be right or wrong makes the prior knowledge of questions extremely problematic once answers are leaked and shared online.

Concern that the lack of detail in this section about timing makes it difficult properly to respond to the proposal.

Q.28-30 – The assessment conditions

Concerns that there is no way of a student's home being reliable or fair – whether this is to do with parental support, or the huge difference in the conditions at home.

A parental declaration does not carry the professional weight of responsibility or obligation that a teacher's or Headteacher's does. There is no way to investigate or ensure conditions were met.

Q.31 – Supporting teachers

Concern that there must be a wealth of training and then of support and moderation given to examiners when they undertake this process – without replicating this in its entirety, there is no way of guaranteeing fairness or accuracy.

Q32-4 – Internal quality assurance

Concern that the external quality assurance must be rigorous, methodical and robust. Here, it is gestured towards in a cursory way. Internal quality assurance is of course important but external quality assurance is the only reliable way of bringing about parity between Centres and overcoming bias. Appeals should not be more forthcoming than in any other year, if external quality assurance is good enough.

Q 35-40 – External quality assurance

Of course there needs to be a robust external quality assurance process. However, the proposal sets out the need not to place ‘unnecessary burden’ on teachers. Qualifying what is and isn’t necessary is a matter of opinion; what is clear is that it will place an enormous burden on teachers. This will stem in part from the marking of assessments, and in part from the gathering of evidence. On this latter point: usually, a subject that involves non-exam assessment or coursework will be set up from the beginning of the course to gather appropriate evidence in fair conditions. The concern here is that there needs to be absolute clarity as to what can constitute evidence; this needs to be communicated well in advance of judgments being made; there needs to be clarity about how to account for the inevitable lack of parity here. In terms of the burden on teachers, the administration and documentation around this needs to be carefully considered.

On Q38 – the point is made that “give greater attention to a school or college whose internal quality assurance arrangements appear to be less robust”; the grounds on which this could be judged are hard to establish other than the third point, that grades are apportioned differently to expectation based on prior performance: clarity is needed here.

Overall, there is a significant concern regarding the timeline here. The proposal is for teachers to mark assessments, internally moderate and decide on grades between early June and mid-June. External quality assurance would then take place between mid-June and the release of grades to students in early July. To condense this process of marking, internal quality assurance, and iterations of external quality assurance into a month is a matter of great concern.

Q41-52 – Process of appeals

Overall, what we infer from this is that more is being invested in the appeals process than the marking, moderation and external quality assurance processes. This is clear both in the number of iterations and the time allowed. It would make far more sense to invest more time and have more iterations of the processes to ensure that we can have confidence in the grades awarded.

There is a question around the burden of proof: would it be the case that the school has made the correct judgement unless an error is clear, or that a full re-mark would take place.

A further concern regards the process following a student appeal. There would be little incentive for a school to uphold a lower grade, in the process outlined. This could lead to substantial grade inflation at a Centre.

Additionally, the notion of a Centre appointing another teacher to moderate in the first instance seems unlikely to lead to greater rigour or confidence.

The lack of a proposed window for appeals is unhelpful – because it appears that so many appeals would be upheld, it may lead to further appeals being lodged.

The appeals process is inevitably anxiety-provoking for students, parents and teachers. It ought to be that the process of awarding grades commands as much confidence as in a normal year of examinations – and the marking and moderation processes need to instil this.

Equality Impact Assessment –

Q61-4 – There is always a significant differential for pupils who are disadvantaged, in care, in temporary housing, are from non-English-speaking backgrounds. However, schools make significant efforts to mitigate against this. In this situation, the differential has been greatly exacerbated. The proposal, firstly, that assessments could be sat within the home would lead to these pupils being

greatly disadvantaged. Further, the gaps in education for these pupils, and those who cannot access online learning easily or routinely, are not sufficiently overcome by these proposals.

We would propose that assessments cannot be sat in the home. It would be better that a process was found for the small number of pupils who could not sit an assessment in the school (involving teacher judgment) rather than there be the possibility that children could sit them at home, since this could confer huge advantages for some children (and therefore they might opt to do so).

Ultimately, there is an argument here against the proposal in its entirety. The exacerbation of disadvantage would be better overcome by a different process – one that allowed for teacher judgment to be more holistic.

We would propose that a system that enabled teachers to arrive at a holistic judgement (as last year's) but that was then subject to checks and balances to ensure that the distribution of grades awarded was in line with expectation and prior performance before the final submission to the exam boards (different to last year – but similar to the iterations undergone through FFT) would be fairer and at least as robust. Centres could then have confidence about the grades awarded before release to students and before entering an appeals process. This would convey a degree of faith in the teaching profession.

Regulatory Impact Assessment –

The impact on school staff is huge. The time consideration for marking and moderation is substantial – and all other normal school activities would be expected to continue alongside. It would be reasonable to expect that exam boards pay teachers for their time marking assessments, in the same way and to the same degree as examiners are. The stress implications of being responsible for students' grades (and the appeals process as outlined) are significant. In terms of cost, would there be an expectation that we still recruit invigilators? Likewise the hours of exams teams within schools to manage the iterations of submitting, revising and processing appeals.