Ofqual Consultation on an additional GCSE, AS and a level exam series in autumn 2020

In April 2020 Ofqual committed to further consultation regarding an additional exam series in autumn 2020 in response to the coronavirus pandemic. The Royal Society of Biology considered the addition of an autumn exam series in its response to Ofqual’s consultation on the exceptional arrangements for GCSE and A level and submission to the Education Select Committee on the impact of COVID-19 on education and children’s services.

The scope of the autumn series

1. To what extent do you agree or disagree that we should require exam boards to offer exams for all of the GCSE, AS and A level qualifications this autumn they had intended to offer in the summer?

<table>
<thead>
<tr>
<th>Strongly agree</th>
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<th>Neither agree nor disagree</th>
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2. To what extent do you agree or disagree that an exam board that receives no entries for a qualification by its entry deadline can withdraw the exams for that qualification from the exam timetable?

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3. Do you have any comments on our proposal to require the exam boards to offer exams in every GCSE, AS and A level subject in autumn 2020?

The Royal Society of Biology remains unconvinced that an autumn exam series open to all students in 2020 is an appropriate solution to ensure students can progress as planned to the next stage of their education.

An autumn exam series will not necessarily benefit students unable to progress to their chosen higher education course in autumn 2020 because they obtained a lower than expected calculated grade award in August. University admissions and clearing processes occur at set times, and are unlikely to change within this short timeframe.

Similarly, students who are intending to progress from GCSE to their chosen A levels will be disadvantaged by the disruption of sitting exams at the start of A level studies. If an autumn exam series goes ahead students might either: a) progress to the A level course, but be expected to miss further teaching time in that course in order to revise and sit GCSE exams or b) be prevented from joining an A level course until an improved result is received, which would cause the student to miss almost an entire term of A level teaching.
Finally, students who are planning to attend a different centre for sixth form studies, will be in a difficult position as any exam entries for an autumn series will require them to attend their previous centre.

The Royal Society of Biology does agree that an autumn exam series would be beneficial for private candidates, who might have been unable to receive a grade if their chosen centre did not feel there was enough evidence to provide a centre assessed grade and position in a ranked order to the exam board.

The Society also agrees that any decision taken regarding autumn exams should be regulated for all exam boards, and new entries should not be allowed unless there is credible evidence that the private candidate would have entered for the summer series.

The number and form of the exam papers

4. To what extent do you agree or disagree that for the autumn series the same number of exams should be taken by students as they would have taken if the summer exams had not been cancelled?

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<tr>
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5. To what extent do you agree or disagree that the exams taken in the autumn series should be in the same form for each qualification as those normally taken in the summer series?

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6. Do you have any comments on our proposal that students taking the autumn exams should take the same number of exams in each subject as they would have taken if the summer exams had not been cancelled and that the exams should be in the same form as the ones they would have taken in the summer?

The Royal Society of Biology recognises that it is unreasonable at this late stage for exam boards to create new exam papers for an autumn series, and not practical to reduce examinable content for students who would otherwise would have been entered for summer exams in 2020.

However, the Society notes that students and centres cannot be assumed to have completed teaching by March 2020. In our response to the education select committee on the impact of Covid-19, we note that remote teaching and learning during this period of school closures has been extremely varied. Digital poverty has been reported to be prevalent across the nation, and many students do not have a comfortable and appropriate place to study in the home, or a home environment conducive to learning remotely.
A level biology, chemistry, physics and geology

7. To what extent do you agree or disagree that exam boards should carry forward the outcome of the practical skills assessments for students who takes exams in A level biology, chemistry, physics and/or geology in the autumn?

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8. Do you have any comments on our proposed approach to A level biology, chemistry, physics and geology practical skills assessment outcomes for the autumn?

If an autumn exam series goes ahead, the Royal Society of Biology feels it is essential that practical endorsements awarded in August are carried forward. At this stage we do not expect schools will be returning to full practical activity in Autumn, and are advising schools to follow social distancing requirements from government and health and safety advice from CLEAPSS when there is a return to laboratory and field work.

Requiring students to complete any practicals required for their practical endorsement would create further burden for centres and students in autumn 2020. Evidence from our members suggests that schools have donated their health and safety equipment such as eye wear to NHS staff, care settings, or other front line staff. Where equipment and appropriate PPE is available, it should be prioritized for use of the 2020/21 cohort who will also need to complete practical activities for their endorsement.

The timing of the autumn exam series

9. To what extent do you agree or disagree that we should put in place provisions that allow the exam boards to offer exams from October 2020, with the exact start and finish dates being confirmed by us when the position on the re-opening of schools and colleges is clearer?

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<tr>
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10. To what extent do you agree or disagree that we should build some flexibility into our regulatory framework to enable us to vary the start and finish dates of the series if that is necessary because of the public health situation?

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11. Do you have any comments on the preferred timing of the autumn exam series?

The Royal Society of Biology remains unconvinced that an autumn exam series will benefit students and their prospective education institutions in 2020/21.
Exams in October with results in December will be too late for progression into higher education courses that are scheduled to begin in Autumn 2020. Students intending to progress to A levels will either be unable to start their course, or will begin A level studies only to have them interrupted in order to revise and sit exams.

The Royal Society of Biology also notes that there is no guarantee schools will be able to return as normal in autumn, and that further delay of an autumn exam series will have a detrimental impact on the mental health and progression of students that are hoping to improve their grade and progress on to the next stage of their education.

The Royal Society of Biology is concerned that while nationally the NHS is preparing for a second wave of COVID-19 in October, the education sector is planning for traditional exams in autumn. Students could face a very traumatic experience in failing to obtain the grade required and preparing for a set of examinations that still may be cancelled or they may be unable to attend due to self-isolation requirements.

Reviews of marking and appeals

12. To what extent do you agree or disagree that the normal review of marking and appeal arrangements should apply to the autumn exam series?

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13. Do you have any comments on our proposal that the normal reviews of marking and appeals arrangements should apply and, if needed, the normal reviews of moderation arrangements?

If an autumn exam series goes ahead, the Royal Society of Biology agrees that reviews of marking and appeal arrangements should apply as normal.

Certificates

14. To what extent do you agree or disagree that we should amend our rules to allow an exam board to issue a replacement certificate to a student to show either their calculated grade or their grade from the autumn exam series, but not require them to do so?

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15. Do you have any comments on our proposal to allow exam boards to issue replacement certificates to students?

The Royal Society of Biology feels it is only fair to issue replacement certificates to students that reflect their best grade, if they are given an opportunity to improve it in an autumn exam series.
**Equality impact assessment**

16. Are there other potential equality impacts that we have not explored? What are they?

The Royal Society of Biology agrees that private candidates are very likely to enter for an autumn exam series, if they were not able to obtain an award through a centre assessed grade and placement in the centre’s ranked order.

The Royal Society of Biology recognises that there is no guarantee that requiring all exam boards to offer examinations in autumn will ensure that all students in all centres can access an exam for a specific qualification if they wish to sit an autumn exam. As Ofqual has noted, the Department for Education has published expectations for centres, however this does not require schools to make entry to autumn exams available. Schools are already facing significant uncertainty regarding planning for teaching in autumn 2020; we are concerned that schools may offer the opportunity for students to sit exams in only a handful of subjects, if any at all. Furthermore, we feel it is likely that student support and access to autumn exams will be related to socio-economic status of the area and resourcing available to the school. For students and families asked to self-isolate due to track and trace procedures, or students that need to quarantine to protect vulnerable family members, further unfairness and uncertainty is introduced by an additional exam series.

The Society is concerned that access to an autumn exam series is also likely to be skewed in the favour better resourced schools in more affluent areas, which are better able to find space in the timetable and physical space in their infrastructure, to facilitate a wide range of exams for their students. Indeed, for some schools it may be impossible to arrange given the other pressures they will be facing if all year groups return and social distancing requirements remain.

Students most likely to be disadvantaged by unconscious bias, digital poverty, lack of access to teaching and learning during school and college closures, or lack of access to comfortable study areas at home, are also likely to be the students at most risk of leaving formal education if there is further uncertainty regarding progression to the next stage.

17. We would welcome your views on how any potential negative impacts on particular groups of students could be mitigated.

**Regulatory impact assessment**

18. Are there additional activities associated with the delivery of an additional exam series in the autumn that we have not identified above? What are they?

In the section “Impact on the FE and HE sectors and employers” it is noted that higher education providers might be asked by students taking exams in the autumn to accept them onto a course once they have their results. Evidence from the Royal Society of Biology’s members suggests that HEIs are unlikely to be able to make this accommodation for
individual students. The existence of an autumn exam series would therefore further increase the chances of large numbers of deferrals to 2020/21, and increased competition for places in 2020/21 as the next cohort also looks to progress into higher education.

19. What additional costs do you expect you will incur as a result of an autumn exam series?

The Royal Society of Biology is not directly involved in delivering national examination Processes. The May 2020 Sutton Trust Covid-19 impact brief on University Access and Student Finance suggests that over half of university applicants would be likely to take a replacement exam in the autumn if they don’t get the grades they hope for. The number of possible entries for an autumn exam series is uncertain and could be significant.  

20. We would welcome your views on any suggestions for alternative approaches that could reduce burden and costs.