

Joint DfE and Ofqual consultation on how GCSE, AS and A level grades should be awarded in summer 2021

January 2021

The Royal Society of Biology responded to Ofqual and DfE's joint consultation on how GCSE, AS and A level grades should be awarded in summer 2021. To inform this response the Society drew on positions developed in 2020 for grade awards in 2020 and 2021, sought to match policy suggestions made to Scottish government, and liaised with other science organisations for consistency. RSB also called for views from our Education and Science Policy Committee, Curriculum Committee, Education Policy Advisory Group, Biology Education Research Group and Heads of University Biosciences.

Ofqual and DfE proposals:

We propose that all students should be able to appeal their grade.

We are seeking views on the timeline for the proposed arrangements. In summary we propose:

- Students would continue with their education during this academic year
- Students would be assessed by their teachers in a period beginning in May into early June
- Teachers would submit grades to the exam boards by mid June
- External quality assurance by the exam boards will be ongoing throughout June
- Results would be issued to students once the QA process is complete, most likely in early July
- Student appeals could be submitted immediately following the issue of results and would first be considered by schools and colleges

2 What the grades will mean

We propose grades this year should be based on teachers' assessments of the evidence of the standard at which their students are performing; it should indicate their demonstrated knowledge, understanding and skills. This is important given that the grades will be indistinguishable from grades issued by exam boards in other years. The exam boards that will issue the results need to be confident the grades are justifiable. Teachers should assess students on the areas of content they have covered and can demonstrate their ability, whilst ensuring sufficient breadth of content coverage so as not to limit progression.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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3 When teachers should assess the standard at which students are performing

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We propose that teachers should make final assessments of the standard of their students' performance during late May and early June. If the assessments were undertaken earlier, perhaps in April, then students would unnecessarily miss out on more of their education. If they were assessed later, perhaps in July, this would delay the release of results, as there would be insufficient time for teachers to assess their students and for the necessary internal and external quality assurance measures to be taken. This could in turn delay students' progression at the start of the next academic year.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 3: When would you prefer that teachers make their final assessment of their students' performance?

May	May and June	June	June and July	July
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 5: Should there be any limit on the period from which previous work could be drawn?

Yes	No
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Question 6: If you answered 'yes', what should that limit be?

Work completed in the previous 1 month	Work completed in the previous 3 months	Work completed in the previous 6 months	Work completed in the previous 12 months	Work completed in the previous 18 months
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Question 7: Do you have any comments on when students should be assessed?

<p>The Royal Society of Biology recommends the approach to GCSE and A level awards this year must have the following features:</p> <p>Equity – students should not be advantaged due to how well they personally, or their centre, were able to deal with the pandemic. While Ofqual and DfE recognise “differential learning loss” on page 9 of the consultation document, nothing appears to be in place to mitigate for this, an option which might have been available through special considerations were exams to take place</p> <p>Consistency – without moderation between schools there will be varying standards and significant uncertainty for HEIs, FE providers and employers</p> <p>Ensure engagement – The Royal Society of Biology welcomes the suggestion that students should be encouraged and incentivised to engage with their education throughout the remainder of the academic year</p> <p>Recognise a lack of security - Ofqual, exam boards and centres must expect any papers set by exam boards to be widely available after first use.</p>
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Subject-level guidance provided by exam boards – this should take into account the nuanced differences in qualifications in the sciences i.e. 17 point grading scale for combined science, tiers of entry, practical endorsement at A level

Standards maintained within subjects – last year’s Ofqual’s report on inter-subject comparability in GCSEs and A-levels in 2020 shows that GCSE Combined Science moved up several places on the mean difficulty related to other subjects, whereas the separate sciences remained in place around the middle of the ranking. Efforts should be made this year to ensure that within the same disciplines there are not inconsistent standards.

For last year’s grade awards the Secretary of State directed Ofqual to ensure that no student was disadvantaged in their progression by the pandemic. It is difficult to see how students will not be impacted by the pandemic, and beyond awarding grades in 2021 DfE and Ofqual must plan for the ongoing impact of disruptions and grades awarded in an unusual manner – The Royal Society of Biology again implores the Department and Ofqual to consider a 3 – 5 year plan, including GCSE and A level assessable content and modes of assessment.

Many students, particularly those that have experienced this most disadvantage during the pandemic, may need additional support to get that the point that they would have been without the pandemic. If grades are to be awarded on the ability, skills and knowledge a student has demonstrated during this turbulent year, it is critical that more support is offered to ensure those students can still progress through appropriate routes. The Department must consider whether transition programmes to A level can be considered, funding options to improve their A level grade in 2021-22, or increased funding for HEIs to deliver foundation courses to an increased number of students in the next few years.

The Royal Society of Biology supports a timeline that aims to give teachers and students as much teaching and learning time as possible, while also supporting teachers with increased workload of assessment and data entry in the Summer term. The Society strongly agrees that as much of the remaining time as possible is used for education and an approach that incentivises further study is encouraged.

Given the huge disparities in learning loss and ability to engage with learning over the last 9 months, using evidence of the standard of a students’ performance from the entirety of their course seems fairest. To assess only based on work completed during the pandemic will compound differential learning losses.

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

We propose that teachers should only take evidence-based decisions about the grade they recommend their students be issued. A breadth of evidence should inform a teacher’s assessment of their student’s deserved grade.

4.1 The use of exam papers

We propose that teachers should assess their students objectively. To support them we propose the exam boards could provide guidance and training, along with papers which teachers could use to assess their students. The exam boards might work jointly on the guidance and training where appropriate. The consultation seeks views on the role of these papers in informing a teacher's assessment of a student's grade.

We propose that the exam boards should use in their papers, questions that are similar in style and format to those in normal exam papers. This means that the sorts of questions used will be familiar to students, who typically use past papers to help them prepare for their exams. The exam boards might use a combination of questions from past papers and new questions to develop their papers.

We propose that the set of papers provided by the exam boards should cover a reasonable proportion of the content and that teachers should also have some choice of the topics on which their students could answer questions. The set of papers could allow teachers the ability to choose from a set of shorter papers, based on topics, to allow teachers options to take account of content that has not been fully taught due to the disruption. In that scenario, multiple papers might be chosen to ensure sufficient coverage of what is assessed.

We propose that the exam boards should provide guidance on how teachers should take account of other evidence of the standard at which the student was working and of factors that might have affected their performance in the papers. In all cases we propose that teachers should record the evidence on which they base their decision for each student. This will be essential if students choose to appeal. It will also be needed by the exam boards for quality assurance arrangements.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

	Compulsory	Optional
All A level	Yes	
All AS	Yes	
All GCSE	Yes	
GCSE English language		
GCSE mathematics		

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 13: To what extent do you agree or disagree that teachers should mark any papers their students are asked to complete?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 14: Do you have any comments on the use of exam board papers?

The RSB would recommend the following process, incorporating Ofqual and DfE's proposals in this consultation, but drawing on the strengths of teachers, Centres and exam boards, and considering feasibility of timeline:

Centres select compulsory exam board provided papers from a set of topic level options

Other work can be used to evidence breadth of content - a minimum breadth of content does not need to be solely assessed through the exam-board papers

Teachers provide a ranked order of students taking into account all evidence, alongside marks for the exam-board set final assessment. This makes use of, and publicly values, teachers' professional judgements, but removes the burden of determining final grade from the Centres. Exam boards use this information to determine final grades. This should include statistical analysis to identify any anomalies from centres. Where an anomaly is identified, the exam board can return the list to Centres for review. This would enable some opportunity for moderation and comparability between centres, as there will be overlap in the questions set by exam-board options.

Grades are awarded on the timeline suggested, with an early return of final grades to centres and students, decoupling from the date for HEI and UCAS decisions.

Appeals process is then much clearer – an appeal can be considered by the school on the basis of the rank order and the exam-board set papers can be remarked by another teacher, leading to a more equitable approach as appeals will not be determined on the basis of which parents, students or Centres are able to apply pressure at the appropriate points and times.

On page 13 Ofqual and DfE suggest they are seeking guidance on the minimum breadth of subject content on which a teacher must assess a student. Learned Societies and subject organisations would be happy to feed into this process for 2021, and indeed offered to do so in our previous consultation response and written submission to education select committee in summer 2020, as well as informally in discussions with DfE, Ofqual and JCQ since school closures were first announced in March 2020. At this time RSB has not been approached to provide input on this subject-level guidance on breadth or depth of content

https://rsb.org.uk/images/RSB_submission_Covid-19_Education_Select_Committee_inquiry_8_June_2020.pdf

https://www.rsb.org.uk/images/RSB_response_to_Ofqual_consultation_on_proposed_changes_to_the_assessment_of_GCSEs_AS_and_A_levels_in_2021_16_July_2020.pdf

As the Society has offered previously, RSB would be able to provide input on the matter of minimum breadth of content, drawing on our draft curriculum framework and the expertise of our Curriculum Committee.

The Society has further questions and recommendations on the award of practical endorsement this year, as detailed in the following section, however this also impacts issue of the minimum breadth of content. ASE's Autumn 2020 research reported that schools were drastically reducing practical activity and DfE's guidance stated that if all CPAC were covered, fewer than the 12 standard practicals were required at A level. This presents a unique challenge for A levels in the sciences as exam papers in normal years include indirect assessment of these practical skills.

4.2 Subjects with non-exam assessment and separately reported results and grades

In A level sciences (biology, chemistry, physics and geology), teachers assess students on their practical skills and students receive a result that is separately reported alongside the main qualification grade. We propose that students who are awarded a grade in 2021 in these qualifications will also receive an accompanying grade or result for the separately reported elements. We propose that teachers should use any evidence they have of the student's performance collected at the point of the award of a grade to determine the separately reported grade or result.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 17: To what extent do you agree or disagree that teachers should mark their students' non-exam assessments?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 19: Do you have any comments on the use of non-exam assessment and separately reported results and grades?

The Royal Society of Biology recommends that practical endorsement is not reported separately in 2021, as it is unfair to award an endorsement to some students who have had more access to or engagement with practical activities during pandemic disruptions, and not award students who, through no fault of their own, were unable to complete CPAC due to school policies reducing practical activity, local restrictions, self-isolation or partial school closures during lockdowns.

When DfE presented its revised plans for the practical endorsement award in Autumn, that was under the assumption that schools would remain open. As this is no longer the case, practical endorsement must be reviewed in 2021.

In any circumstance, a clearer cross-board statement is required on practical endorsement if it is to be awarded. For example, acknowledging the reality that many schools may not have completed all standard practical activities or CPAC coverage, and pointing to particular areas that may be examined indirectly.

Again, RSB strongly encourages DfE and Ofqual to make an explicit commitment to the importance of practical work and skills, including observation of demonstrations, engaging with virtual laboratories and simulations.

4.3 Other performance evidence

We propose that teachers should be able to take other evidence of a student's performance into account when deciding on the grade to be submitted to the exam board.

We propose that where teachers devise their own assessment materials, they should be comparable in demand to the papers provided by the exam boards. Any assessment must allow students to demonstrate the standard at which they can perform.

We propose that any teacher devised assessments used to support the final assessment should be used at the same time as the exam board papers would be taken, to avoid any students being unfairly advantaged or disadvantaged by the timing of when they are assessed. Teacher devised assessments should be supported by mark schemes, in order to support consistent marking within a school or college and any appeals.

We propose that the exam boards should provide guidance for each subject on the relative use of different forms of performance evidence.

We propose that other sources of performance evidence could include:

- formal tests
- mock examination results
- substantial candidate work (which relates to the qualification specification, and where the school or college are confident it was completed without support / external support)

Question 20: To what extent do you agree or disagree that a breadth of evidence should inform teachers' judgements?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 24: Do you have any comments on the use of other performance evidence?

The Royal Society of Biology has suggested above that the approach taken this year should include teachers using standardised assessments to provide marks to exam boards, and a rank order list in which other evidence can be considered to evidence the level at which a student is working.

This would allow more weight to be placed on final assessment, but by exam boards who are used to weighting and statistical analysis.

Subject level support for teachers is vital, including exemplars, guidance on assessments and other performance evidence, best practice on avoiding bias and discrimination, weighting of evidence, in-school and external moderation or quality assurance and special considerations. And exam boards should be expected to engage with every centre at a subject level before and during the assessment period, when grades are submitted and after they are issued.

5 The assessment period

If schools and colleges use exam board provided papers or create their own, we propose they should be used by teachers within a set period of time. If students who are completing the papers do so at different times there is a risk that students taking the papers later in the window might be at an advantage, particularly if the content of the papers is leaked.

We propose that, in the interests of fairness and consistency, students assessed with and without the use of the exam board papers should be assessed as late as possible in the academic year.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 27: Do you have any comments about the assessment period for the use of exam board papers or teacher devised assessments?

6 The conditions under which students should be assessed

We expect that students' performance will be assessed within their school or college – we are hopeful that the course of the pandemic will make this possible in line with public health guidance in place at the time. However, even if this is possible for most students, it might not be possible for all. We therefore propose that, if the pandemic makes it essential, where papers are to be used in the final assessment, the papers could be completed at an alternative venue, including a student's home, where that is an option.

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

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 30: Do you have any comments on the conditions under which students should be assessed?

It seems possible that ongoing disruptions and school closures may mean students are not able to safely sit exam-style papers in school. There is little information in the consultation document on how at-home assessment would work, how challenges of remote observation or invigilation would be overcome, or how the ongoing issue of digital divide/digital poverty/unsuitable working environments would be addressed.

If assessments are conducted remotely further polarisation of achievement will be seen, with well supported students more able to find the space, quiet and parental assistance to do well.

Disadvantage gaps are likely to widen with some students sharing devices, with limited internet access, and lack of a comfortable place to study and in which to sit assessments.

7 Supporting teachers

We propose that the exam boards should provide support materials and training to help teachers objectively and consistently assess their students' performance. This would likely cover exemplars where possible to guide teachers as they assess their students, guidance on how to conduct the assessments, information on other performance evidence that could be taken into account, and best practice on avoiding bias and discrimination. The guidance would likely also cover how teachers should consider the impact on a student's performance at the time of their assessment of any events outside of their control (such as the impact on their performance of illness or family bereavement).

The exam boards should check that school and college senior leaders know what is expected of them and their teachers and that they have put in place appropriate arrangements to support their teachers to fulfil their role.

We propose that during the consultation period the exam boards should seek views from their schools and colleges on the support materials and training they would most value and that, where appropriate, the exam boards should work together to provide this.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Internal quality assurance

We propose that the exam boards should provide support and information for schools and colleges on the requirements for assessing their students. Their aim will be to secure as much consistency as possible about the standard of performance required for each grade in a subject, both between students in a school or college and between schools and colleges. They might build on the support and information they provide to support the marking of non-exam assessments.

We propose that a key part of the internal quality assurance arrangements should be a declaration by the head of the school or college confirming that the exam boards' requirements had been met, that they support the grades submitted for their school or college and that all teachers who had assessed students had regard to the guidance and support materials that had been provided.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 34: Do you have any comments about internal quality assurance?

The Royal Society of Biology agrees that both internal and external quality assurance is required, and that schools should be supported and receive subject-level guidance from exam boards around quality assurance.

However, to ensure approaches are consistent across schools there must be moderation or input from exam boards at a subject level.

The Society suggests that statistical analysis is required by exam boards following submission of the grades. While we recognise the political reasoning for avoiding use of an algorithm to adjust individual student grades, it is vital to ensure consistency and parity between schools that some checks and balances are conducted. We recommend that exam boards assess grades, and if there is an anomaly or issue the exam boards return data to the Centre enabling teachers to review and intervene, before exam boards validate results. This would enable use of statistical analysis to identify issues, but would not require statistical methods to be used to alter student grades.

While Ofqual have noted that usual comparability between individuals, centres and years will not be possible, the onus must remain on exam boards to provide standards, guidance and teacher training to enable teachers to do the job as best as they can

9 External quality assurance

We propose that the exam boards should quality assure the approach taken by each school and college and that the exam boards should work together, where appropriate, to make sure their approaches are both consistent and do not impose unnecessary burden on schools and colleges.

We propose that the exam boards should require assurance about the internal quality assurance arrangements all schools or colleges have used. Exam boards should also sample, at subject level, the evidence on which the submitted grades were based.

We propose that the exam boards should engage with every school or college to consider the approach it is taking. All schools and colleges, regardless of cohort size, geography, demographic or centre type could be subject to further checks. We would also expect the exam boards to target some of their quality assurance activities. They might, for example, spend more time with a new school or college verifying that compliant processes are in place, or give greater attention to a school or college whose internal quality assurance arrangements appear to be less robust, or to scrutinise whether there was evidence to support grades that, overall, appear to be unusually high or unusually low.

We propose that the exam boards could only change submitted grades after a review of the evidence and following discussion with the school or college.

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

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 36: To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 38: To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 40: Do you have any comments about external quality assurance?

Page 23 of the consultation suggests an appeal should be considered by a competent person appointed by the school or college, who had not been involved with the original assessment. The Royal Society of Biology recommends that guidance on this matter must specify not only a competent person but someone with disciplinary expertise in that subject area.

Identifying a competent person that has not been involved in the assessment may be a significant challenge for teachers that teach small cohorts, or are the only subject specialist in the Centre.

Other sections on:

10 How students could appeal their grades

We propose that teachers should not tell students the grade they have submitted to the exam boards on their behalf. However, we propose that once results have been issued a student who believes their teacher has made an error when they assessed their performance in 2021 should be able to appeal to their school or college on that basis. The review would encompass both a review of the marking of any papers provided by the exam board or the school or college itself, the marking of any non-exam assessment, as well as a review of the other evidence used by the teacher to arrive at the overall grade.

We propose that the appeal should be considered by a competent person appointed by the school or college, who had not been involved with the original assessment – this could be another

teacher in the school or college or a teacher from another school or college.

We propose that a student should also be able to appeal further to the exam board. This would not be an appeal on the merits of the teacher assessment of the school or college's appeal decision. Rather an appeal to the exam board would be on the grounds that the school or college had not have acted in line with the exam board's procedural requirements, either when assessing the standard at which the student was performing or when considering the student's appeal. A student could not appeal to the exam board on the basis that either the teacher assessment or the appeal decision was not a reasonable exercise of academic judgment where the correct procedure had been followed.

We propose that students could not appeal to the exam board until they had the outcome of their appeal to the school or college.

To relieve pressure on the appeals process, we are seeking views on whether results day(s) in 2021 should be brought forward as this could be of benefit to students, schools and colleges and further and higher education providers. Students should only be issued with their result once external quality assurance by the exam boards has been completed. If there is an appetite for results to be brought forward we will consider the interaction between the timing of students receiving their results and the results becoming formal for the purpose of university admissions, working with the further and higher education sector to ensure no delay to existing admissions timelines. We propose that the exam boards should publish information for use by schools and colleges on how to deal with appeals.

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

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 43: To what extent do you agree or disagree that the school or college should consider the appeal?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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 follow the exam board's requirements when it assessed the student's performance?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 50: To what extent do you agree or disagree that if results day 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 52: Do you have any comments on the proposed appeal arrangements?

The Royal Society of Biology agrees that pressure needs to be relieved from the system to allow for a different appeals process this year, de-coupling grade awards to students from UCAS and HEI decisions seems a sensible way to achieve this.				
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It is likely this year that far more appeals will take place than in a normal year, with significant pressure on teachers and Centres from parents and students. The timeline for results must reflect this increased workload burden.

However, given that institutions across the UK accept students from all of the home nations as well as international students, it is critical that the timing of English qualification awards does not interfere with, and disadvantage students from other nations. That is, English students should not be permitted to accept offers or approach institutions at an earlier date than their counterparts in other nations.

Page 23 of the consultation suggests an appeal should be considered by a competent person appointed by the school or college, who had not been involved with the original assessment. The Royal Society of Biology recommends that guidance on this matter must specify not only a competent person but someone with disciplinary expertise in that subject area. Identifying a competent person that has not been involved in the assessment may be a significant challenge for teachers that teach small cohorts, or are the only subject specialist in the Centre.

11 Private candidates

We want to build into the approach opportunities for private candidates (for example students studying independently, and home educated students) to be awarded grades in summer 2021.

We believe there are four possible approaches:

- a) for private candidates to complete the papers set by the exam boards for use in schools and colleges. The exam boards would mark the papers (and any completed non-exam assessment) and issue a grade to the private candidate based on their performance
- b) for private candidates to work with a school or college willing to assess the standard at which they are performing – using the same type of evidence the school and college is considering for its students.
- c) for the exam boards to run normal exams for private candidates to take in the summer of 2021 – appropriate venues would need to be provided.
- d) for the exam boards to run normal exams for private candidates to take in the autumn of 2021 – appropriate venues would need to be provided.

We wish to be confident there will be a route available for all private candidates to receive a grade. We recognise that, given the pressures on schools and colleges created by the pandemic, and the potential public health considerations, schools and colleges might be reluctant to make entries for and then assess private candidates this year. We also wish to manage the costs to private candidates.

We know of some private candidates who were unable to receive a grade in summer 2020 and who did not take the exams in the autumn who are particularly concerned how the arrangements will work for them. For these students, and others, any further delay could have significant

consequences for their progression.

We are interested to know which of the options private candidates, in particular, would prefer were put in place.

Private candidates will also need to be able to appeal their grade. The route for the appeal would need to align with the way their grade was determined.

Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 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?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 55: To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 56: To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021?

Strongly Agree	Agree	Neither Agree nor Disagree	Disagree	Strongly Disagree
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Question 57: Do you have any comments on the options for how grades should be made available to private candidates?

Question 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?

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

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

Yes	No
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Question 60: If you answered no, which students should be allowed to enter for them?

Any student who wishes to take exams	Students taking the qualification from outside of the UK	Students taking their exams in UK but not in England	Private candidates
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How the proposed arrangements for 2021 differ from those used in a normal year and those used in 2020

Students who had been expecting to take exams will wish to understand how our proposed approach will be different to that of a normal year. The table below summarises the normal arrangements and the proposed alternative arrangements for 2021.

Equality impact assessment

Question 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?

Yes	No
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Question 62: If you have answered 'yes' please explain your reason for each proposed arrangement you have in mind.

This consultation document suggests exam boards will provide training and guidance for teachers on avoiding unconscious bias and discrimination while determining student grades this year. We support this approach and encourage exam boards, Ofqual and DfE to make this a priority while other details of the grade awarding process in 2021 are being fine tuned.

While Ofqual recognise a legal duty to comply with the Equality Act 2010, and within that equality of opportunity for those with protected characteristics, Ofqual, exam boards and the Department must recognise and mitigate against causing further disadvantage to students who have experienced wider socio-economic disadvantages, learning loss due to school closures, shielding or self-isolation, personal or family health, or lack of ability to engage with remote learning during periods of partial school closure. These issues may well be exacerbated during a period of standardised testing and there appears to be no inclusion of special considerations processes in these proposals.

Question 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?

Yes	No
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Question 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.

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Regulatory impact assessment

Impact on schools and colleges, on students, on exam boards, on FE and HE sectors and employers plus estimated costs and savings

Question 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?

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

Question 67: What costs would you save?

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