

## **NAHT response to Ofqual consultation on the autumn exam series**

### **Scope**

**Question: 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?**

Agree

**Question: 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 for timetable?**

Agree

**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?**

On balance, NAHT supports the proposal to require exam boards to offer exams for all of the GCSE, AS and A level qualifications this autumn that they had intended to offer in the summer.

Government policy is clear that the purpose of the autumn exams are an opportunity for students who feel that their grades from the summer do not reflect their ability and for those, mainly private candidates, for whom schools and colleges have been unable to submit a centre assessed grade or rank order.

In order to fulfil this purpose and stated government policy, offering all qualifications is necessary.

However, it must be recognised that this approach will place the most additional burdens and costs onto schools and colleges. The numbers of students who might be sitting such exams and the range of subjects in which exams will be offered will have a significant impact on schools and colleges capacity to cope with any additional exam series. Therefore, significant consideration must be given to the wide range of opportunities to mitigate these burdens and costs.

Running an exam series requires substantial preparation and has significant implications on the day to day running of a school or college including staffing, resources, rooming and timetabling. In the current circumstances, it is uncertain when secondary schools and colleges will fully open to all students. In a recent NAHT survey of our secondary members, 68% of respondents highlighted this as a key concern in relation an autumn exam series.

As students do return it is vital schools and colleges have the time and capacity to re-establish routines, rebuild relationships and support their students pastorally and academically as well as maintaining the well-being of their staff. An exam series which runs through October and November will be disruptive for staff and students in a term where there will be other priorities due to the impact of coronavirus alongside the normal work of an autumn term, including marketing to prospective parents and students and running internal assessment cycles.

In our recent NAHT survey, 75% of respondents stated that an autumn exam series will create a challenge to effectively supporting the academic and wellbeing needs of

their current cohorts of students alongside an additional exam series. 62% of survey respondents were also concerned about the increased staff workload of an autumn exam series and a further 58% were concerned about the impact of this on staff wellbeing.

Ofqual recognises that we do not know how many students might wish to take exams in the autumn and this causes additional problems. Schools and colleges will need to start to plan and resource the series as they return in September. The number of candidates and the reasonable adjustments required, has an impact on the size and number of rooms and the number of invigilators needed. In the absence of this information, schools and colleges will have no choice but to plan for high numbers. Potentially there will be significant disruption for two months of the autumn term for very small numbers of candidates, to the detriment of those students in the current cohorts.

In our survey, 75% of respondents reported that they would face challenges in coordinating exam arrangements with students who have left their school. Three quarters of survey respondents also stated that a lack of available rooms/space for exams and in-person teaching to occur concurrently would be a significant challenge if an autumn series was run in their school or college.

NAHT therefore believes that it is unreasonable in the circumstances to require schools and colleges to run a full exam series for all qualifications in the autumn term. It is vital they can focus on what is needed for their current students whether that is a phased reopening, improving remote learning or face to face teaching of small groups.

NAHT suggests that the best solution to mitigate this entirely negative impact would be for local hub centres to be set up for students to take exams in the autumn term with any additional costs borne centrally by government. This is preferable to each centre running a full exam series with potentially small numbers of students. The majority of respondents to the recent NAHT survey supported the proposal of local hub centres and did not think centres should be charged fees for autumn exam series entries.

## **Form**

**Question: 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?**

Agree

**Question: 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?**

Agree

**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?**

NAHT agrees that the number and format of exam papers must be the same as students would have expected had they sat their exams in the summer term. Teachers will have ensured students knew the format and expectations for each paper and students will have completed assessments and mock exams using past questions and past papers. As students will need to prepare for the autumn series independently it would be unfair to change these expectations and there would be no reliable way to communicate any such changes to students who were no longer attending their original centre.

However, this approach maximises the additional burdens and costs which would be experienced by centres as it essentially means the full summer exam timetable being moved into the autumn term. Significant consideration must therefore be given to the wide range of opportunities to mitigate these burdens and costs. NAHT believes that it is unreasonable in the circumstances to require schools and colleges to run a full exam series for all qualifications in the autumn term and suggests that the best solution would be for local hub centres to be set up for students to take these exams.

### **NEA**

**Question: To what extent do you agree or disagree that, with the exception of art and design, grades for GCSE, AS and A level awarded in the autumn should be based only on students' performance in their exams, with no non exam assessment?**

Agree

**Do you have any comments on our proposed approach to basing grades for the autumn on students' exam performance only?**

Although NAHT agrees that in these exceptional circumstances this is the most reasonable approach to take we would reiterate the significance of the potential disadvantages arising from this for students which are identified in the consultation. It is therefore vital that awarding organisations take the absence of non-exam assessment into account in a transparent way which is fair to students and so as not to increase their disadvantage. Clarity and reassurance must be provided to students on how this will be achieved.

**Question: To what extent do you agree or disagree that grades for GCSE, AS and A level art and design awarded in the autumn should be based on a new task completed under supervised conditions?**

Agree

**Question: To what extent do you agree or disagree that any new task for GCSE, AS and A level art and design should be set and marked by the exam board?**

Agree

**Do you have any comments on our proposed approach to the assessment of GCSE, AS and A level art and design in the autumn 2020 series?**

Although NAHT agrees that in these exceptional circumstances this is the most reasonable approach to take, there are logistical issues which need to be resolved.

Students' original centres may not have the capacity to facilitate 10-15 hours of non-exam assessment; this will take staff, rooms and learning resources away from their current cohorts, impacting on their teaching, learning and progress. As these hours need to be offered in substantive blocks of time, the only possibility might be to do this after the normal school day. Staggered start and finish times for students likely to be in operation to reduce social contact might create further problems. In all cases this will create additional workload for staff involved and potentially create a more stressful environment for students completing the assessment.

### **Separately reported grades and results**

**Question: 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?**

Agree

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

No

**Question: To what extent do you agree or disagree that exam boards should carry forward the outcome of the GCSE English language spoken language assessment for students who take exams in the qualification in the autumn, as in any other year?**

Agree

**Do you have any comments on our proposed approach to the GCSE English language spoken language assessment outcomes for the autumn?**

No

### **Timing of the autumn series**

**Question: 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?**

Strongly disagree

**Question: 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?**

Strongly disagree

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

NAHT believes that it is unreasonable in the circumstances to require schools and colleges to run a full exam series for all qualifications in the autumn term. In our recent survey, only a quarter of respondents thought that such a series would be feasible in their school. 75% of respondents reported that they would face challenges in coordinating exam arrangements with students who have left their school. Three quarters of respondents also stated that a lack of available rooms/space for exams and in-person teaching to occur concurrently would be a significant challenge.

It is vital that schools and colleges can focus on what is needed for their current students whether that is a phased reopening, improving remote learning or face to face teaching of small groups. Three quarters of respondents (75%) to our survey felt it would be a challenge to effectively support the academic and wellbeing needs of their current cohorts of students alongside an additional exam series.

In addition to the reasons outlined earlier in our response, it is completely unreasonable to expect schools and colleges to plan and prepare to implement this series without any certainty of when, or whether, it will occur. This level of uncertainty is not helpful for schools and colleges as they will need to take action in August and September in preparation for the autumn series and will necessarily invest resources, including significant staff time and money, and recruit invigilators.

The proposal that the exam series will run over the October half term holiday is also unacceptable and places unreasonable expectations on schools and their staff. 62% of respondents to our survey were concerned about the increased staff workload of an autumn exam series and a further 58% were concerned about the impact of this on staff wellbeing. School and college staff are under immense pressure in the current circumstances and this increased workload is likely to continue through the autumn term as students return to school. It is essential that staff are enabled to take the breaks they are entitled to.

Such uncertainty about the exam series being able to be run in schools and colleges will also have an impact on students. Students need to know the timetable of their examinations when they make their entries; for AS and A level candidates this will still only give them 6 weeks to study and prepare. If the exam dates are moved this could have a negative impact on students' motivation and trust in the system. In a worst case scenario, if schools and colleges are required to run the series and public health requirements mean schools have to close again for a period of time, either nationally or at a local level, the whole series would be delayed or disrupted and the purpose of the series that students can progress to the next stage of their education or training will not be fulfilled. If there are local area closures, in line with government policy to manage local outbreaks this would significantly disadvantage one group of students over another creating huge disparity and unfairness in the system.

An alternative solution is needed to reduce the potential impact of the on-going uncertainty about when schools and colleges will re-open to all students and the possibility that the autumn series will need to be moved in response to public health requirements.

NAHT suggests that the best solution to mitigate these issues would be for local hub centres to be set up for students to take exams in the autumn term with any additional costs borne centrally by government. The majority of respondents to our recent survey supported the proposal of using local hub centres for exams in the autumn term. With careful planning, these hubs could be organised to withstand most of these uncertainties about the opening of schools and colleges and could incorporate current social distancing and hygiene requirements.

## **Reviews of exams and appeals**

**Question: To what extent do you agree or disagree that the normal review of marking, moderation and appeal arrangements should apply to the autumn exam series?**

Agree

**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?**

Although this is a reasonable approach, NAHT believes that further thought must be given to the issue of fees.

NAHT is clear that centres should not be charged any fee for entering students for exams in the autumn series; the majority of respondents (79%) to our recent survey stated that no fees should be charged. Schools and colleges have paid entry fees for the summer series and are currently working to provide centre assessed grades and a rank order for all students in the absence of exams this summer. The autumn series is part of the process of awarding grades this summer; it is therefore reasonable for centres to expect entries to those exams to be covered by the fees they have already paid for their students' qualifications in 2020.

It follows from this reasonable assumption, that centres might be expected to pay a fee for any reviews of appeals following the autumn series, however, only 16% of respondents to our recent survey said that centres should be charged for any appeals or reviews from the autumn series.

There are additional issues which need consideration. The majority of students will not be attending their original centre raising questions about the process for students to discuss the options of reviews and appeals with teachers and the capacity of teachers in that centre to do this. In our recent survey, when asked about the additional burdens and costs of an autumn exam series, 56% of respondents selected decisions on reviews of marking and appeals and 72% selected liaising with students who have moved to a new provider.

## **Certificates**

**Question: 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?**

Agree

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

No

## **Project qualifications**

**Question: To what extent do you agree or disagree that we should not impose any additional requirements on the exams boards that award the EPQs?**

Agree

**Do you have any comments on our proposal that we should not impose any additional requirements on the exams boards that award the EPQs?**

No

### **Advanced Extension Award**

**Question: To what extent do you agree or disagree that we should not impose any additional requirements on the exam board that offers the Advanced Extension Award?**

Agree

**Do you have any comments on our proposal that we should not impose any additional requirements on the exam board that offers the Advanced Extension Award?**

No

### **Equality impact assessment**

**Question: Are there other potential equality impacts that we have not explored? What are they?**

NAHT believes that there are a number of student groups that may be disproportionately negatively affected by the proposed arrangements for an autumn exam series. Many of these groups will have been already disadvantaged by coronavirus, school closures and the exceptional awarding arrangements for summer 2020. Of particular concern, is the exclusion of non-exam assessment considering that certain groups, such as students with SEND, may perform better in these.

In addition to students with EAL and SEND, Ofqual must recognise that socio-economically disadvantaged students and students from a black and minority ethnic (BAME) background may have also been educationally disadvantaged during coronavirus and school 'closures'.

Data from the Department of Work and Pensions, on Households Below Average Income 2018/19 found that across England 4.1 million children are living in poverty. Remote learning is likely to have been more challenging for these students as they may lack access to the necessary technology and internet connectivity to engage with online learning. According to the 2011 census 4.6% of children lived in crowded homes and it is likely that these children will not have adequate space to undertake effective learning at home.

In relation to students from BAME communities, research has shown that Covid-19 has disproportionately affected members of these communities, who make up 18% of the UK population. A report from the Intensive Care National Audit and Research Centre found that a third of patients critically ill with coronavirus were non-white (33.6 per cent). Therefore, students from BAME families are almost twice as likely as their

white peers to be coping with illness, be fearful for their relatives or grieving for lost ones.

Therefore, it is likely that the education and wellbeing of students from disadvantaged backgrounds and the BAME community will have been disproportionately disrupted by coronavirus. Pupils from disadvantaged backgrounds may also be in less of a position to proactively prepare for an autumn exam, lacking access to private tutoring and other additional resources.

NAHT is particularly concerned about what arrangements will be made for students who may need to continue to shield at home. It is crucial that proactive and pragmatic arrangements are considered now to ensure that these students can take exams if they wish to, as there is a real possibility that some students will not have returned to school by the autumn exam series.

There are also several other groups of students who will have been disadvantaged by this year's exceptional arrangements for awarding grades as they have low attendance throughout the school year. This includes students in the criminal justice system, students with mental health issues, students who have had long term illness or been in hospital, students from Gypsy, Roma and Traveller communities and students in care who frequently move schools. These groups of students will have had less exposure to school and teachers, so may be disadvantaged by the awarding arrangements this summer and may face more challenges in proactively preparing for an autumn exam. In particular, students from the Gypsy, Roma and Traveller community may face significant challenges in returning to the centres that submitted their entries for summer exams. NAHT calls on Ofqual to consider these groups and put in place proactive measures to address the double disadvantage they may face.

NAHT urges Ofqual to go beyond recognising which groups will be disadvantaged and set out a more detailed plan of how the impact of these disadvantages will be monitored, accounted for and negated in their proposals for an autumn exam series.

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

NAHT believes that holding the autumn exam series in local hub centres would go some way to mitigating this impact. Significantly, it would reduce the chances of further exam cancellations or delays in light of future public health requirements and potential future school closures. The further cancellation of exams would be significant for private candidates, of whom a notable proportion are students with SEND, and those students with low school attendance. For these students, future exam cancellations may prevent any progression this year and cause further disruption to their education and wellbeing.

Local hub centres would make the exam series more accessible for students who may have moved to new providers or new areas, such as students from the Gypsy, Roma Traveller community and some students with SEND for whom transport can be an issue. NAHT also believes it would be easier to organise social distancing in local hub centres which would increase the chances of medically vulnerable students being able to take their exams.

Whilst, NAHT accepts Ofqual's position on using exam-only performance for the results of the autumn exam series NAHT is concerned that this may disadvantage particular student groups. Ofqual must consider the effect of this decision on groups

with protected characteristics, particularly students with SEND, who may do disproportionately better in non-exam assessment. NAHT calls on Ofqual to set out greater detail on their proposals to adjust the results to account for this and to ensure these groups are not further disadvantaged in relation to their peers.

### **Regulatory impact assessment**

**Questions: Are there additional activities associated with the delivery of an additional exam series in the autumn that we have not identified above?**

Yes

#### **What are they?**

NAHT have considered Ofqual's assessment of the impact on schools and colleges. We agree with the additional activities listed in the consultation but want to highlight that this is not an exhaustive list and it must be expected that there will be other activities associated with the delivery of a full autumn series of exams. For example, 72% of respondents to our recent survey indicated that communicating with and supporting students they have entered for exams who have moved onto new providers will create additional burdens and costs for them. Additionally, 39% of respondents indicated that they may also need to arrange transport for these students to and from their centres. These additional activities will emerge over time, vary from school to school and will change in light of the changing public health situation.

NAHT urges Ofqual to consider that, during the autumn term, schools and colleges will be fulfilling their normal roles and responsibilities as well as coping with the impact of Covid-19 and school closures. These normal roles and responsibilities include familiarising students with new classes and teachers, supporting the transition for new year 7s, marketing the school to prospective parents including tours and open evenings and running their internal assessment cycles. Importantly, most schools and colleges have mock exams for year 11 and year 13 during the second half of the autumn term. Therefore, trying to balance holding an autumn series with the internal assessment cycle will be problematic.

In addition to these activities, schools and colleges will be establishing a 'new normal', the shape of which is highly dependent on the emerging public health situation. This will involve: rebuilding routines, relationships and support; accounting for lost learning time; establishing new protocols, routines, timetables and processes; supporting students with their mental health and wellbeing; supporting the wellbeing and mental health of staff; managing staff shortages; and supporting vulnerable and disadvantaged students. During this period of time, schools and colleges will always be alert to changes in the public health situation, the transmission rate of coronavirus, and ongoing concerns that schools and colleges may have to close again. 68% of responses to a recent NAHT survey highlighted that the uncertainty as to whether our school will still be partially closed or fully open would be a key challenge for running an autumn exam series. These uncertainties will create additional stress for staff and students.

Any exam series has significant implications on the running of a school as we have outlined earlier in our response. NAHT is particularly concerned about the impact of this on special schools and colleges, who will be supporting students for whom the transition back to school may be particularly challenging.

NAHT believes that it is unreasonable in the circumstances to require schools and colleges to run a full exam series for all qualifications in the autumn term. It is vital they can focus on meeting the needs of their current students and supporting their staff.

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

NAHT have considered Ofqual's assessment of the impact on schools and colleges. We agree with the additional burdens and costs listed in the consultation but want to highlight that this is not an exhaustive list. It must be expected that there will be other costs and burdens to schools and colleges if they are expected to deliver a full autumn series of exams; these will emerge over time, vary from school to school and will change in light of the changing public health situation.

Some additional costs and burdens that have been identified by our members include: the need for additional spaces to conduct exams which may result in the loss of additional income gained from renting out these spaces to the local community and the cost of arranging transport for students who require it and may have moved to new providers.

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

NAHT believes that the best approach to mitigate burdens and costs would be for local hub centres to be set up for students to take exams in the autumn term with any additional costs borne centrally by government. Local hubs could provide exam accommodation meeting current public health requirements as well as reducing overall costs and staffing needs. Such an approach would also reduce the risks of delay or cancellation and the further costs which would be incurred should that happen.

Fees related to these exams could be a source of further costs which must be mitigated. NAHT is clear that centres should not be charged any fee for entering students for exams in the autumn series which is part of the process of awarding grades this summer; it is therefore reasonable for centres to expect entries to those exams to be covered by the fees they have already paid for their students qualifications in 2020.

Ultimately, schools and colleges cannot be expected to bear the additional burdens or costs associated with the exceptional arrangements for the awarding of qualifications this summer. Government must recognise that these unique arrangements bring increased and unexpected costs to centres and it is government who must provide the funding required to implement them.