

NAHT response to Ofqual consultation on the expectations of schools and colleges to allow for calculated grades

- 1. Do you agree that asking teachers and lecturers for an estimated grade and the rank order of students is the fairest approach that can be taken, given the government's decision that exams in May and June will be cancelled?**

NAHT agrees that this approach is the fairest one to take in these exceptional circumstances, subject to our comments and suggestions below.

- 2. We expect exam boards will ask teachers and lecturers to come to holistic judgements about the grade/s they think a student would have been most likely to have achieved in the summer if they had taken their exams. Considering the things we have set out above, are there other factors we should reflect in the expectations or any you think should not be included?**

The bullet points listed of what teachers should consider when making their holistic judgement are appropriate.

The wording "*This will include...*" suggests that if there is an additional relevant factor not specifically identified, that teachers could include this. Is this Ofqual's intention?

NAHT is concerned by the line "*Individual schools and colleges will determine whether and, if so, how they consider evidence produced by students after they closed to all but the children of key workers.*" This adds a level of choice and inconsistency into the process which is not desirable and we believe that a clear decision must be made on this issue for all schools and colleges to follow.

As an illustration of the difficulties which this wording could cause, some of our members are reporting that since the closure of schools, some secondary schools are setting their Year 11 and Year 13 students past papers with, in some cases, accompanying mark schemes to self-mark. These students are being asked to report the grade back to the school which will then form evidence of higher grade work. This behaviour is understandably panicking students and staff in schools where this is not the case and shows how damaging a lack of clarity, and the rumour mill, can be.

Allowing schools and colleges to decide whether and how to include evidence produced after school closures could encourage these negative behaviours. We believe there must be a definite instruction to schools and colleges rather than a choice as the current words suggest and perhaps the fairest approach is to instruct schools and colleges to take account of evidence only up to the date of school closures.

Ofqual guidance should include reference to students for whom teachers would have applied for particular access arrangements and special considerations in their examinations. Teachers must be clear whether they

are taking this into account using their holistic judgement or whether applications for special considerations are to be made in the normal way to awarding organisations, recognising that it relates to the period up to the school closures, rather than the examination period.

NAHT opposes any requirement on schools and colleges to collate or provide any evidence to awarding organisations to support their judgements. This is completely unnecessary, would create significant workload and in many cases be impossible in the current circumstances. However, schools and colleges should be reminded to keep their students work, mark books, etc in case it would be useful to support any appeal made after results are issued.

What is vital is that Ofqual guidance on how teachers make the decision on this grade needs to be as clear as possible in order to maximise consistency across the system and so maintain confidence across all stakeholders in the grades which teachers have awarded.

- 3. We expect exam boards will ask teachers and lecturers to come to holistic judgements about the grade/s they think a student would have been most likely to have achieved for those subjects with additional grades (GCSE English language and A level science subjects). To what extent do you think this information may already be available?**

NAHT suggests that teachers will have the evidence to award a holistic grade for the additional grades in these subjects.

- 4. We expect exam boards will ask schools to ask teachers and lecturers to determine a rank order within each grade for all the students in the school or college. Considering the things we have set out above, what guidance in particular do you think will be important in supporting teachers to determine these rank orders? Do you think this might be particularly challenging to achieve in certain types of centre or in certain subjects?**

NAHT recognises the need for teachers to provide some form of ranking of the students in the cohort of their subject.

However, it would be exceptionally difficult to rank every student, top to bottom, within a grade where in some cases there would be no evidence to justify a teacher putting one pupil above or below another. On what basis would teachers rank a student as 17 of 30 students at grade 6?

This difficulty would exist in most subjects even with relatively small cohorts of one teaching group but will be exacerbated by larger cohorts and where subjects are taught by more than one teacher.

A set of descriptors which create a broader and more realistically achievable rank may be preferable. One possible example of such descriptors may be:

Borderline above (student likely to achieve the next grade up on their best performance);

High (student highly likely to be within the top of mark range);
Secure (confident that this student is solidly in the middle of the mark range);
Low (student highly likely to achieve the lower mark range)
Borderline low (student equally likely to achieve the grade below on their best performance)

Of equal need to consider these difficulties and ensure any ranking is based on teacher evidence, and where no such evidence exists such ranking should not be arbitrary. Teachers should only be expected to rank students as far as they are able and that may mean having some students ranked at the same level.

In addition, there may be logistical issues which schools and colleges face in providing holistic grades and any rank order, for example, staff of some teaching groups may be sick, others may be working remotely, the evidence needing consideration may be in school and not accessible remotely, etc. Any guidance must recognise the possible existence of these issues and what schools and colleges should do in these circumstances.

- 5. We are mindful there will be a lot of interest in teachers' judgements from students and parents. We also know that teachers must be supported in making these professional judgements without being subject to undue pressure, and that the grades they determine may be changed following the standardisation process. Given this do you think teachers' estimated grades should be able to be shared with parents or students?**

Note: it will not be possible to share rank order information without releasing personal data, so this will not be allowed.

NAHT strongly believes that teachers' estimated grades should not be shared with parents or students at this point. As recognised above, this could subject schools and colleges and their staff to significant undue pressure and therefore undermine confidence in the grades awarded across the whole system.

Students and parents will be aware of the grades and marks awarded by teachers over the period of learning including for classwork, homework, mock exams, tests and non-exam assessment. They will have also received formal reports and attended parents evenings to discuss attainment and progress.

An additional reason why this is not appropriate is that teachers submitted grades would not necessarily be the grades finally awarded to students as they are to be considered alongside other evidence including prior attainment and grade distributions. Requiring teachers to share the grades they submit at this stage could lead to significant confusion when results are received where those results do not match teacher estimation, further undermining confidence in the process applied this Summer.

- 6. To support a process that is fair to all students, we expect exam boards will ask the head of centre to confirm that the expectations set for this process were followed to determine the grades and the rank order submitted and that in their judgement what is submitted is a true representation of student performance. Do you think such a step will be manageable for schools and colleges?**

If this is simple process, similar to the headteacher declaration used for primary statutory assessment, then we believe this would be manageable. Such a requirement should not place unreasonable expectations on heads of centre and should demonstrate trust in the professionalism of teachers and leaders. There must be recognition of the need for delegation of this confirmation in the absence of the Head of Centre.

- 7. We know some students will have recently joined schools and colleges, and some others may not have studied at the centre but instead will have been planning only to take their exams there. How much contact do you believe a school or college will have to have had with a student in order to make an estimate of their likely grade?**

Some of these situations could be very difficult for centres to manage and staff may face undue pressure from students and their parents to estimate a grade.

It seems clear that where students were due only to sit their exams at the centre, and have not been attending the provider for lessons, teachers will not be in any position to provide any estimation of grade or ranking.

In other circumstances, for example, but not limited to, where students have recently joined a school, where they have had a very significant period of absence during the course or where they are flexi-schooled, it would seem most sensible for these to be considered on a case by case basis. Schools and colleges should be supported to make a professional decision, without undue influence or perverse incentives, on whether they have sufficient information and evidence to make such a judgement.

- 8. We are planning to provide information for students on this process. Do you have any thoughts on what this should include?**

There is a need to ensure confidence in the grades awarded this year and in the role of teachers whose professional expertise means they are best placed to make the decisions asked of them. It must also be made clear to students that their teacher's submitted grade is not necessarily the grade which the student will receive as it will be considered alongside other evidence including prior attainment and grade distributions.

The narrative must be that teachers and awarding organisations will take an approach that awards realistic and fair grades to everyone with all of the information which is available to them.

Information to students should also cover the situations referenced in question 7. If students are in this situation, they need to accept and understand why their teacher may or may not believe that they can provide an estimated grade. Students should also know what their options are if their teacher cannot provide an estimated grade for them.

Students should be reminded that, as is the case every year, there will be a process for appeals, but care should be taken that this message does not undermine confidence in the process by which grades will be awarded. The same is true of any messaging around the opportunity to sit an exam in the Autumn Term; this could be interpreted as a lack of trust in teachers and awarding organisations to award grades if it is described simply as an option for students if they are not happy with their result.

9. Is there anything else you suggest we should be considering at this stage?

The key aim this year must be to maintain the confidence of parents and students in the grades they are awarded and for them to feel they have a real grade which is of as much value as any other year.

As such, the message that teachers are professionals who are absolutely in the best place to make a judgement on the grade their students would have got had they taken the exam must be paramount.

A vital element for this approach to succeed is the removal of any undue pressure or perverse incentives on providers and teachers. Before teachers are asked to make judgements about grades the Department for Education must reiterate the decision to publish no performance data for 2020 and give further clarity that performance tables measures will not be calculated and performance tables will be frozen. In addition Ofsted need to be clear that their ISDR will be frozen and that they will not seek to look at any school level data from 2020.

Ofqual should also consider how to reassure centres that the process of awarding this year will recognise that centre level volatility exists and that this means that the grades submitted by teachers may be quite different to the grades achieved by their students last year. Some explanation of how this will be approached and how the awarding organisations and Ofqual will make decisions if volatility is significantly different to previous years would be helpful.

Although the current focus must be on the awarding of grades, all stakeholders will have questions about reviews and appeals and so some indication of the plans for these should be included in any guidance. This will serve to reassure providers, teachers, parents and students that an opportunity to appeal will exist even if the finer details of how this will work are not available.

NAHT believe Ofqual should give further consideration to the proposal of an exam “early in the Autumn term” for those students who want to take it. If schools and colleges do not open again until September it will take several

weeks to achieve a sense of settled normality before they could consider an additional exam series. Such an open offer may cause significant issues where students have moved on to new providers. There are also questions about how students would make this decision, what such an exam would cover and how students would prepare for that. It might be that the taking of such an exam becomes part of the reviews and appeals process for this unprecedented situation.

Finally, we are receiving various queries from members regarding payment of exam fees for this Summer. Some, it seems, are being chased by awarding organisations for payment which in the current circumstances which schools and colleges are dealing with seems completely inappropriate. The second issue being raised is the amount being charged. Members see that there are no exams, (which means no employment of examiners, etc), assume that the cost of delivery of the qualifications is therefore reduced and believe that this reduction should be reflected in the fees which they are being charged. This is something which must be addressed, preferably with a uniform approach, message and explanation across all awarding organisations.