

**NAHT response to Ofqual consultation on arrangements for exams and assessments in 2020/2021**

**1. To what extent do you agree or disagree that the 2021 exams should not include more optional questions than usual?**

Strongly agree

Agree

Neither agree nor disagree

**Disagree**

Strongly disagree

**2. Do you have any comments on the use of optional exam questions in the 2021 exams?**

NAHT members are disappointed with the very limited and unambitious proposals related to GCSE, AS and A level exams in 2021. Students have faced significant disruption to their learning this academic year, and even the best remote learning provision cannot match the progress students make with regular face to face teaching. It is very likely that these students will also face some disruption to their learning in 2020/2021 with individuals or groups self-isolating, schools needing to close due to outbreaks of coronavirus and the possibility of local, and even national, lockdowns.

The specifications for GCSE, AS and A levels contain significant content which is already difficult to cover in the time available, but these unprecedented circumstances make it impossible to guarantee that all students will be able to “catch up” alongside the learning and exam preparation which teachers would have had planned to cover through autumn and spring terms. These expectations are completely unreasonable, on teachers and on students.

Schools are being left in the unenviable position that they are expected to cover as much content as possible in the time left. This may necessitate a change in teaching methods leading to thinly spread knowledge, rather than high quality teaching and learning giving the depth of knowledge, understanding and skills which students really need to progress to the next stage of their education or training. The impact of this situation on students cannot be under-estimated. Year 11 and Year 13 are immensely pressured years in any circumstances. But to be ready for their exams in 2021 and to cover all of the content of their qualifications as normal, everyday would be intense, with all lessons needing to move rapidly through the specification and leaving little time for ensuring understanding, consolidation or enjoyment of learning. It could mean extra time in the classroom or with private tutors, before and after school, at lunch times and even at weekends. The proposals will fail in any adequate way to mitigate the impact of the coronavirus pandemic on students’ education and may have a negative impact on their mental health, emotional wellbeing, engagement and motivation. Part of the rationale for adapting assessments for summer 2021 must be to support young people’s wellbeing and mental health. NAHT does not believe there have been sufficient adaptations proposed to achieve this.

Adaptations need to be made to reduce the content across all subjects at GCSE, AS and A level to give schools and colleges some choice over the content they teach and therefore help teachers and students to cover that content in appropriate depth. NAHT finds it difficult to find a rational reason why there are proposals to do this only in GCSE History, Ancient History and Geography when many other subjects are assessed in similar ways. The assumption that AS and A level students are “likely to be more motivated to study the narrower range of subjects of their choice and they

should be better independent learners” is misplaced; these students, and their teachers, will face the same challenges as those studying for GCSEs. Ofqual claims that “*in many other GCSE subjects which are taken by large numbers of students, we have proposed changes which will free up teaching time without making any changes to the way subject content is sampled*”. These minor changes will have a very minimal impact in a limited range of subjects and do not adequately address the significant concerns of our members.

We raised our concerns about arrangements for 2021 examinations soon after schools closed to the majority of their students, and thorough consideration should have been given to these issues alongside the immediate priority of awarding in 2020. Given more time, adaptations could have been identified and proposed across a greater number of subjects at GCSE, AS and A level with a more wholesale and consistent, rather than piecemeal, approach.

With only two weeks left of the summer term, regrettably it now seems far too late to make the adaptations to content which are truly necessary. Schools and colleges would need final decisions to be made and communicated by the end of the summer term so that plans for teaching, learning and exam preparation could be changed. Schools and colleges are therefore left with an absence of any real proposals to mitigate the impact of the pandemic on students learning and progress towards their qualifications.

The over simplistic nature of this plan, based on all examinations going ahead as normal in 2021, completely ignores the potential further impact on teaching and learning next academic year with the possibilities of individual and group isolation, local or even national lockdown. Qualifications awarded on the basis of an exam, where students experiences of teaching and learning next year could be very different, will be unfair and lead to additional disadvantage for some students compared to others. This “plan A” also takes no account of the fact that in some areas the 2021 exams could be disrupted and some students may be unable to sit them. It is clear that additional plans must be put in place.

School and college leaders recognise these issues and have questioned the absence of any acknowledgement from Ofqual or government of any supplementary activity to “plan A” or indeed a “plan B”. Our members believe that it is probable that a centre assessed grade and rank order, similar to that submitted by centres this year, will be needed for some or all students next year for GCSE, AS and A level qualifications. Ofqual and government must be open about this possibility now and trust school leaders and education professionals to know that this is the case, enabling them to ensure the additional workload for staff can be managed appropriately. Schools and colleges will be able to proactively prepare for this and make appropriate amendments to planning, assessment and data collection from the start of the autumn term. Awarding organisations could also work to simplify processes, improve their support/guidance materials and remove other administrative burdens.

### **3. To what extent do you agree or disagree that the number of exams taken for each subject in 2021 should be the same as usual?**

Strongly agree

Agree

Neither agree nor disagree

**Disagree**

Strongly disagree

**4. Do you have any comments on the number of exams taken for each subject in 2021?**

Reductions in qualification content could be identified and proposed across a greater number of subjects at GCSE, AS and A level with a more wholesale and consistent, rather than piecemeal, approach. Such adaptations may result in reasonable changes to the number or length of exams to be sat by students. Had changes been confirmed by the end of the summer term, teachers would have had enough time to prepare students for them; this would not have been a significant challenge.

Fewer, or shorter, exams in each subject would enable teachers to ensure their students gained the depth of knowledge, understanding and skills which they need to progress to the next stage of their education or training. This ambitious approach to adaptation could be supported by the submission of centre assessed grades and rank orders. Such an approach would support an appropriate balance between the academic achievement of students and their wellbeing which is lacking in current proposals.

With only two weeks left of the summer term, regrettably it seems far too late to make the adaptations which are truly necessary and to reflect these in the examinations to be sat. Schools and colleges would need final decisions to be made and communicated by the end of this term so that plans for teaching, learning and exam preparation could be changed.

**5. To what extent do you agree or disagree that the exams taken in 2021 should not be longer than usual?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

**6. Do you have any comments on the length of exams in 2021?**

Reducing content or increasing optionality should not necessitate an increase in the length of any examinations.

Changes to the exam timetable

**7. To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 if results can still be released on 26 August 2021?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

**8. To what extent do you agree or disagree that the GCSE timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

Strongly agree

Agree

Neither agree nor disagree  
Disagree  
**Strongly disagree**

**9. What would be the advantages and disadvantages of delaying the start of GCSE exams in 2021?**

NAHT would only support the GCSE timetable being moved to after the summer half term if results days remained as planned and that there was no attempt to compress those exams into a shorter time frame for students. Although a later start to the examinations would provide a small amount of extra teaching time, the benefits of this are not significant enough to outweigh the potential risks to marking and awarding or the disadvantages of delaying results.

**10. To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 if results can still be released on 19 August 2021?**

Strongly agree  
**Agree**  
Neither agree nor disagree  
Disagree  
Strongly disagree

**11. To what extent do you agree or disagree that the A level and AS timetable should start after half term in 2021 even if this necessitates a delay in the release of results?**

Strongly agree  
Agree  
Neither agree nor disagree  
Disagree  
**Strongly disagree**

**12. What would be the advantages and disadvantages of delaying the start of A level and AS exams in 2021?**

NAHT would only support the A and AS level timetable being moved to after the summer half term if results days remained as planned and that there was no attempt to compress those exams into a shorter time frame for students. Although a later start to the examinations would provide a small amount of extra teaching time, the benefits of this are not significant enough to outweigh the potential risks to marking and awarding or the disadvantages of delaying results.

**Equality impact assessment**

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

NAHT believes that Ofqual has correctly recognised the disproportionate impact that the coronavirus pandemic has had on the education and wellbeing of different groups of students. The effect will be wide ranging and will continue to emerge over time, making it difficult to quantify at the current time.

In light of the lack of proposals related to the content of AS and A levels, there is a need to highlight that all of the concerns raised about students who have been educationally disadvantaged during the coronavirus pandemic also apply to students

sitting their AS and A levels in 2021. According to DfE data on 2019 A level results, the average grade was C for disadvantaged students (increased from C- in 2018), and C+ for all other students (the same as in 2018). The average point score (APS) for pupils on free school meals (FSM) was 28.8 compared to 34.2 for non-FSM students and for pupils with SEN it was 30.7 compared with 33.0 for pupils with no identified SEN. DfE data also found that Black students had the lowest APS per entry for A level. We know that these are some of pupils who may have been disproportionately negatively affected by the coronavirus pandemic.

In addition to the student groups listed by Ofqual in the consultation, NAHT would like to highlight the educational disruption experienced by a group of students for whom the coronavirus pandemic has exacerbated safeguarding issues. This may include students living with domestic abuse, parental mental health needs and parental alcohol and substance misuse. According to data from the Children's Commissioner 472,000 children were reported to be living with an adult who has reported to be dependent on drugs or alcohol and 2,933,779 children are living with at least one parent reporting symptoms of anxiety/depression. According to NSPCC, as many as one in five children are exposed to domestic abuse during childhood. The experiences of these students will not only affect their mental health and ability to learn during lockdown but may create ongoing issues on their return to school and when preparing for exams and assessments.

NAHT believes that these proposals will create geographical disparities which are not addressed. As we have seen with Leicester, local lockdowns are likely to be a reality during the next academic year. Therefore, it is likely that some students in local areas will have missed content and will be further disadvantaged under the current proposals for the summer exams in 2021.

NAHT believes that the whole education system must take responsibility for mitigating the negative impact of the coronavirus pandemic on young people's educational progress and future. Everyone that can play a part must: schools, colleges and teachers, Ofqual, the Department for Education and awarding organisations. We recognise the scale and difficulty of this task. As these proposals stand, NAHT does not believe that Ofqual will achieve their limited objective to prevent further disadvantage.

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

It must be acknowledged that a planned system of submitting centre assessed grades and rank orders, similar to those submitted by centres this year, will be needed for some or all students next year for GCSE, AS and A level qualifications to mitigate both the known and unknown negative impacts. Schools and colleges must be able to proactively prepare and make appropriate amendments to planning, assessment and data collection from the start of the autumn term and ensure the additional workload for staff can be managed appropriately. Ofqual and the awarding organisations should develop a systematic approach to how these would be utilised to support the awarding of qualifications in the range of circumstances in which we might find ourselves in next summer.

### **Regulatory impact assessment**

**16. Are there additional activities associated with changing the exam and assessment arrangements for students taking the qualifications in summer 2021 that we have not identified above? What are they?**

School leaders and school staff have worked tirelessly over the past four months to entirely redesign educational provision in line with public health requirements. The proposals set out in this consultation will have significant workload implications for school leaders and their staff. It is likely that Ofqual's consultation decisions will be published either at the very end of the summer term or in the summer holidays. This will necessitate school leaders and teachers working over the summer holidays to adjust their curriculum, including their plans for non-exam assessment, in line with Ofqual's decisions, ready for the start of the autumn term.

NAHT has recently conducted a survey on our member's wellbeing and workload. The survey closed on 13<sup>th</sup> July and we had 3425 responses. The vast majority (93%) of respondents said their workload had increased; over half (56%) said it had greatly increased. 63% had been regularly working weekends, 71% had regularly been working in the evening and just under a third (31%) had not a weekday or weekend since 16th March that they had not worked. The majority had worked over the Easter break (88%) and over May half term (85%). This is having a significantly negative impact on school leaders mental and physical health. 69% of respondents said that the coronavirus pandemic has had a negative impact on the quality and quantity of sleep and 61% say they are physical exhausted. 80% of respondents say the pandemic has negatively affected their mental health and wellbeing. When asked about the causes of this, 92% said government guidance (including delays, frequency of updates, timing of updates), over three quarters (78%) said an increase in workload. 76% said they were concerned about the mental health and wellbeing of pupils (76%) with over a quarter (26%) concerned about exams and assessments in 2020/21.

It must be acknowledged that a planned system of submitting centre assessed grades and rank orders, similar to those submitted by centres this year, will be needed for some or all students next year for GCSE, AS and A level qualifications to mitigate both the known and unknown negative impacts. This will create an additional workload burden, but this will be exacerbated the later in the academic it is announced.

**17. What additional costs do you expect you would incur if the proposed changes to the exam and assessment arrangements were introduced for summer 2021?**

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

It must be acknowledged that a planned system of submitting centre assessed grades and rank orders, similar to those submitted by centres this year, will be needed for some or all students next year for GCSE, AS and A level qualifications to mitigate both the known and unknown negative impacts.

This year staff worked diligently to achieve a fair set of grades in a short timeframe. This was only possible to achieve as teaching staff had "gained time" with the cancellation of all exams meaning that setting and marking practice questions, revision and other exam preparation for Year 11 and Year 13 did not need to happen. This will not be the case next year.

