

Ofqual Consultation questions – NRCSE responses in blue
CENTRE ASSESSMENT GRADES

QUESTION – to what extent do you agree or disagree that we should incorporate the requirement for exam boards to collect information from centres on centre assessment grades and their student rank order, in line with our published information document, into our exceptional regulatory requirements for this year?

QUESTION – to what extent do you agree or disagree that exam boards should only accept centre assessment grades and student rank orders from a centre when the Head of Centre or their nominated deputy has made a declaration as to their accuracy and integrity?

QUESTION – to what extent do you agree or disagree that Heads of Centre should not need to make a specific declaration in relation to Equalities Law?

QUESTION – to what extent do you agree or disagree that students in year 10 and below who had been entered to complete exams this summer should be issued results on the same basis as students in year 11 and above?

STRONGLY AGREE: Most students attending supplementary schools are studying their mother-tongue/heritage language in addition to a full set of GCSEs/A Levels in their mainstream school, which is why they take the language examination earlier. Taking the examination at the same time as the other examinations places undue pressure, creates timetabling issues, and may impact on performance, or may result in students dropping out of the 'community' language examination altogether.

QUESTION – to what extent do you agree or disagree that inappropriate disclosure of centre assessment judgements or rank order information should be investigated by exam boards as potential malpractice?

QUESTION – do you have any comments about our proposals for centre assessment grades?

YES: Community-based examination centres have reported a delay in communication from Ofqual and examination boards on the new arrangements. Supplementary schools appear not to have been communicated with at all although they could provide tutor assessment and other relevant evidence of their students' level. Most students entered for 'community' language exams at their

mainstream schools are also still waiting for communication regarding their language entry. Certain private examination centres have refunded examination fees directly but with no further information as to when students will be able to enter the exams. We call on Ofqual and the Department for Education to recommend to all mainstream schools that they should ask all their students entered for a 'community' language exam whether they attend classes in that language and allow the teachers of those students to submit evidence to support the submission of a predicted grade. This process should allow for predicted grades from teachers who have been trained and supported by overseas governments. We also call on Ofqual to make allowances for any issues such as rank ordering which may arise from such arrangements being put into place for the first time.

ISSUING RESULTS

QUESTION – to what extent do you agree or disagree that we should incorporate into the regulatory framework a requirement for all exam boards to issue results in the same way this summer in accordance with the approach we will finalise after this consultation and not by any other means?

QUESTION – do you have any comments about our proposal for the issuing of results?

IMPACT ON STUDENTS

QUESTION – to what extent do you agree or disagree that we should only allow exam boards to issue results for private candidates for whom a Head of Centre considers that centre assessment grades and a place in a rank order can properly be submitted?

DISAGREE: for 'community' language entrants and young adults from refugee and migrant backgrounds who are not in education many of whom enter individually and rank ordering may not be possible.

QUESTION – to what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to students in the rest of the UK?

QUESTION – to what extent do you agree or disagree that the arrangements we put in place to secure the issue of results this summer should extend to all students, wherever they are taking the qualifications?

QUESTION – do you have any comments about the impact of our proposals on any particular groups of students?

YES: NRCSE wishes to emphasise the potential for a lack of fairness and equity which could result in students missing out on receiving a qualification unless the issues outlined in this response are addressed.

STATISTICAL STANDARDISATION OF CENTRE ASSESSMENT GRADES

Aims : The proposed aims of the standardisation process are as follows:

- i. to provide students with the grades that they would most likely have achieved had they been able to complete their assessments in summer 2020;
- ii. to apply a common standardisation approach, within and across subjects, for as many students as possible;
- iii. to use a method that is transparent and easy to explain, wherever possible, to encourage engagement and build confidence;
- iv. to protect, so far as is possible, all students from being systematically advantaged or disadvantaged**, notwithstanding their socio-economic background or whether they have a protected characteristic;
- v. to be deliverable by exam boards in a consistent and timely way that they can quality assure and can be overseen effectively by Ofqual.

We will seek to meet these aims while maintaining the standard of qualifications over time. Where the aims listed above are in tension (for example, accuracy of approach versus ease of explanation), we will seek to find an optimal balance.

QUESTION – to what extent do you agree or disagree with the aims outlined above?

AGREE : not 'strongly' as we are actually arguing for some allowances to be made for this cohort, which is therefore not a common standardised approach.

QUESTION - to what extent do you agree or disagree that using an approach to statistical standardisation which emphasises historical evidence of centre performance given the prior attainment of students is likely to be fairest for all students?

QUESTION - to what extent do you agree or disagree that the trajectory of centres' results should NOT be included in the statistical standardisation process?

QUESTION - to what extent do you agree or disagree that the individual rank orders provided by centres should NOT be modified to account for bias regarding different students according to their particular protected characteristics or their socio-economic backgrounds?

QUESTION – to what extent do you agree or disagree that we should incorporate the standardisation approach into our regulatory framework?

QUESTION – do you have any comments about our proposals for the statistical standardisation of centre assessment grades?

APPEALING THE RESULTS

QUESTION – to what extent do you agree or disagree that we should not provide for a review or appeals process premised on scrutiny of the professional judgements on which a centre's assessment grades are determined?

QUESTION – to what extent do you agree or disagree that we should not provide for a student to challenge their position in a centre's rank order?

QUESTION – to what extent do you agree or disagree that we should not provide for an appeal in respect of the process or procedure used by a centre?

QUESTION – to what extent do you agree or disagree that we should provide for a centre to appeal to an exam board on the grounds that the exam board used the wrong data when calculating a grade, and/or incorrectly allocated or communicated the grades calculated?

QUESTION – to what extent do you agree or disagree that for results issued this summer, exam boards should only consider appeals submitted by centres and not those submitted by individual students?

DISAGREE : for 'community' language entrants many students enter individually and they should, therefore, have the option to appeal on that basis

QUESTION – to what extent do you agree or disagree that we should not require an exam board to ensure consent has been obtained from all students who might be affected by the outcome of an appeal before that appeal is considered?

QUESTION – to what extent do you agree or disagree that exam boards should not put down grades of other students as a result of an appeal submitted on behalf of another student?

QUESTION – to what extent do you agree or disagree that exam boards should be able to run a simplified appeals process?

QUESTION – to what extent do you agree or disagree that we should not provide for appeals in respect of the operation or outcome of the statistical standardisation model?

QUESTION – to what extent do you agree or disagree with our proposal to make the EPRS available to centres for results issued this summer?

QUESTION – do you have any comments about our proposals for appealing results?

YES: As a disproportionate number of students taking 'community languages' examinations enter individually, they should have the option to appeal on that basis i.e. not have to rely on doing so via an examination centre.

AUTUMN EXAM SERIES

QUESTION – to what extent do you agree or disagree that entries to the autumn series should be limited to those who were entered for the summer series, or those who the exam board believes have made a compelling case about their intention to have entered for the summer series (as well as to students who would normally be permitted to take GCSEs in English language and mathematics in November)?

TO WHICH QUALIFICATIONS THE EMERGENCY REGULATORY MEASURES WILL APPLY

QUESTION To what extent do you agree or disagree that we should apply the same provisions as GCSE, AS and A level qualifications to all Extended Project Qualifications and to the Advanced Extension Award qualification?

QUESTION – do you have any comments about the qualifications to which the exceptional regulatory measures will apply?

BUILDING THE ARRANGEMENTS INTO OUR REGULATORY FRAMEWORK

QUESTION – to what extent do you agree or disagree that we should confirm that exam boards will not be permitted to offer opportunities for students to take exams in May and June 2020?

QUESTION – to what extent do you agree or disagree with our proposals that exam boards will not be permitted to offer exams for the AEA qualification or to moderate Extended Project Qualifications this summer?

QUESTION – do you have any comments about our proposals for building our arrangements into our regulatory framework?

EQUALITY IMPACT ASSESSMENT

QUESTION: Are there other potential equality impacts that we have not explored? If yes, what are they?

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

YES: NRCSE wishes to emphasise the potential for a lack of fairness and equity which could result in students missing out on receiving a qualification unless the following issues are addressed. We further wish to emphasise that bilingual/heritage language learners work hard to achieve these qualifications and they are academically important to them. They should be encouraged not discourage from take GCSE and A level examinations where these are available. It should be noted that:

- Students typically study their 'community' language in their own time (often Saturdays).
- Even if they have some degree of oral fluency they are unlikely to have to have the grammar, vocabulary and literacy required to take an academic examination in the subject. This is why they attend 'supplementary schools'

- Students start studying a 'community'/heritage language at the age of 5 or 6, it is for this reason that they are ready to take the GCSE when they are in Yrs 10, 9 or even 8.
- The standard form of the language in the examination is often different to the variety or dialect they may be familiar with at home.
- Many students study their 'community language' as part of their heritage but have been born and/or been growing up in the UK, or indeed be several generations removed from native speakers in their family history, and therefore do not necessarily speak the language regularly.

REGULATORY IMPACT ASSESSMENT

Are there additional activities associated with the delivery of the revised approach that we have not identified above? What are they?

What additional costs do you expect you will incur through implementing this approach?

What costs will you save?

We would welcome your views on any suggestions for alternative approaches that could reduce burden: