



Awarding GCSE, AS and A Levels in 2021: delivering DfE and Ofqual expectations and supporting teachers in their assessments

Executive summary

Over the last few weeks the Exam Boards, through JCQ, have been considering how best we can support teachers and deliver the Secretary of State's policy on the awarding of grades for GCSE, AS and A Levels in 2021. Having reviewed the joint consultation document released on 15th January 2021, and through subsequent discussions, we believe there is a high degree of alignment between our thinking and that of the Regulator and of the Department.

The approach proposed in this paper focusses on the Secretary of State's decision that grades this year will be awarded by teachers based on their professional academic judgement and that, apart from in rare exceptional circumstances, these will not be amended or modified.

The role of the Exam Boards is to provide support and information to assist teachers and centres (schools, colleges and other learner environments that are registered as exam centres) to award appropriate grades to students, and then to certify these grades. The high-level principles underpinning this approach are detailed below:

- Awarding of grades will be based on **teacher assessments**
- Students will be **assessed on what they have learnt**, rather than against content they have not had a chance to study
- A **Common Assessment** will provide a consistent framework for awarding grades across centres
- Teachers will be supported through the provision of **training and guidance**
- The overarching objectives are to enable **student progression and secure public acceptance**
- The solution must:
 - include **learner agency**;
 - be **deliverable**; and
 - take **account of the public health context** and be future proofed against centres being unable to open in March, before Easter or by the summer
- Students must have a route to check the **accuracy of the grades** being submitted and to appeal their grades.

The approach outlined in this paper focuses on:

- **Supporting teachers** through the provision of training, guidance and information on grading, including materials to support the use of Common Assessments.
- **Common Assessments** that we expect centres to use which:
 - will be drawn from past papers;
 - should be viewed as an important part, but not the only part, of the basket of evidence;
 - are designed to support teacher judgements around grades; and
 - should not be timetabled, or windowed, to provide greater flexibility for centres to adapt to their needs.
- **Centre policies to support grading** that outline the approach to be taken within each centre to arrive at the awarded grades.
- A three-stage **Quality Assurance (QA) process** encompassing:
 - a Centre-level review of the approach being adopted (likely to be paper-based);
 - a Second-level review on a case-by-case basis; and
 - Quality Control checks using a risk-based approach.
- An **appeals process** for students that relies on teachers recording (on proformas) and discussing with students the information that determined their grades (e.g. marks for assessments and any access arrangements or special considerations that have been applied) ahead of students being informed of their result:
 - Centre review post internal QA of teacher assessment – to correct any factual errors and to conduct a review of marking (akin to that with non-exam assessment (NEA)) where marks are challenged;
 - Exam Board post results appeal process to correct any factual errors and review procedures used for allocating grades.

Exam Boards will not be able to review centres' academic judgement.

Ensuring equality and support for those with protected characteristics remains a key objective for Exam Boards. This will be achieved by the following:

- Working with centres to ensure students with protected characteristics are not disadvantaged
- Supporting arrangements that account for:
 - a reduction in teaching and learning, especially face-to-face teaching; and
 - public health guidance restricting students' ability to undertake fieldwork, practical, and group work.
- Once the outcomes of the consultation are known, Exam Boards will seek to ensure the removal of any potential adverse impact on students who share particular characteristics and are committed to:
 - ensuring assessment of learning and quality assurance procedures are sensitive to the needs of all students, whilst not compromising fairness and consistency; and
 - providing arrangements to meet the needs of disabled students and/or those with additional support needs without compromising integrity.
- We will provide training and guidance to centre staff on:

- ensuring that students with approved access arrangements are accommodated appropriately;
- how centres can take account of any illness students may be experiencing, or any other personal circumstances outside their control, at the time they are producing evidence that will be used in determining their final grade; and
- how to avoid conscious and unconscious bias when making final grading decisions.

We also lay out a proposal to ensure private candidates can be accommodated by provision of the Common Assessment or other tasks to create a basket of evidence on which a grade can be awarded by a centre. We also propose that the DfE could assist private candidates through a support service akin to that used for the autumn 2020 exam series.

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Context

Following the [letter of 13 January 2021](#) from the Secretary of State and subsequent [Chief Regulator's response](#), Ofqual and DfE have launched a [consultation](#) into arrangements for providing grades to students with the absence of exams during 2021. Exam Boards have been invited to respond to that consultation along with other stakeholders. Exam Boards are in a unique position. We deliver public qualifications determined by government policy, that are regulated by Ofqual, Qualification Wales and CCEA. We work with teachers and leadership teams in exam centres together with their representative associations to support them in delivering the learning content to their students. Exam centres are responsible for the delivery of examinations to students and each year Exam Boards engage 50,000 teachers to mark those examinations. As Ofqual states in their consultation, 'Exam Boards that will issue the results need to be confident the grades are justifiable' and will have a large responsibility alongside exam centres for delivering the outcomes to hundreds of thousands of students.

It is for the Secretary of State to determine government policy and for Ofqual to determine the rules by which Exam Boards are allowed to operate in England. Similar arrangements are in place between the devolved governments, regulators and Exam Boards in Wales and Northern Ireland. The regulators themselves are governed by [statute](#) which was established outside of a pandemic situation and Ofqual might like to consider, along with the Education Select Committee as to the extent to which these objectives can be maintained in these exceptional circumstances. The existing regulations do not allow Exam Boards to certificate students for GCSE 9-1 or A Levels through anything other than the arrangements described in the regulations. Exam Boards are not privy to the full range of responses that Ofqual and DfE are receiving in their consultation. Governments and regulators will need to make their decisions based on those responses, which will of course include Exam Boards' views.

Over the last few weeks, the Exam Boards, through JCQ, have been considering how best we can support teachers and deliver the Secretary of State's policy. During this time, JCQ has:

- brought together experts from across the Exam Boards to consider different aspects of the process;
- liaised with its Teacher Association Forum;
- considered how a process could be delivered both from Exam Board and teacher perspectives.

We hope this summary provides a useful and viable proposal from the perspective of the Exam Boards, informed by the conversations we've had with those we work closely with, including Ofqual, DfE, teaching associations, exam centres, parents and students.

Introduction

Our starting point is to ensure students have agency in their grade. Students rightly expect their grade to reflect their own performance in the content that they've studied and that this grade will support their progression. Students want to know that they have an equal chance of progression as other students competing for the same opportunities. They also expect the opportunity to appeal the outcomes.

There is very limited time. It will be the end of February before Ofqual and DfE announce the outcomes of their consultation. It's also possible that Ofqual will need to consult further on the technical aspects of regulation that Exam Boards have to comply with following this. Exam Boards would only have March and April to produce all guidance and support materials, any Common Assessments, train teachers to consistently apply it and a very limited window to gather, validate and verify any evidence for the grades being awarded. The existing requirements for content, assessment and grading are defined in the qualifications which took several years to develop during the qualifications reform programmes. It will not be possible for Exam Boards to recreate that content in different ways, redefine assessment requirements and support teachers with consistent grading in a few short weeks. There will be limitations to the extent to which Exam Boards can create a quality assurance process in the weeks that we have available. In a normal year, Exam Boards set consistent standards through the grading processes and share data among themselves and with regulators to achieve that. The grading standards across Exam Boards are understood through the content defined in the specifications, grade boundaries applied to assessments and the associated student work and exemplification. Any different understanding of the standard would take further work. Even a perfect solution is likely to fail if people don't have time to understand it. The implications of this are that:

- existing materials are standardised, exemplified, will be more easily understood and faster to develop; and
- using new materials would take time to develop, be less consistent and be less likely to be understood by teachers.

Exam Boards need to deal with the reality of the situation in which we find ourselves. The situation with Covid is uncertain and we do not know for certain whether or not exam centres will be able to open either individually, regionally or nationally at any given time. As the Secretary of State says: 'we cannot guarantee that all students will be in a position to sit their exams fairly this summer' and the Prime Minister has announced that schools will not reopen in England until at least 8 March 2021. The deadline for Centre Assessed Grades (CAG) submission in 2020 was 19 June. Exam Boards were still resolving queries with exam centres in August to ensure that every student had a grade. In addition, [Exam Boards dealt with thousands of appeals](#), the vast majority of which were where exam centres had made errors with the CAG they had entered into the system.

- Solutions which require students to be in the exam centre to take the assessment may drive further uncertainty and be less likely to succeed, a solution that also works in a remote context is more likely to be resilient.
- Time between the deadline for submitting grades and allocation of Further and Higher Education places will support quality assurance checks and UCAS clearing processes. The less time, the more likely there will be large numbers of students that do not receive a grade or receive an incorrect grade and as a result, miss out on progression opportunities.

The Secretary of State has set out that 'the process will not involve second-guessing the judgement of teachers but confirming that the process and evidence used to award a grade is reasonable. Changes should only be made if those grades cannot be justified'. Exams and moderated assessment cover the range of content that has been taught and differentiate between what

students are able to demonstrate having undertaken a course of study. They provide a method of ensuring grades are based on the work of the individual student because of the conditions in which they are taken. There is normally more than one and they are taken on different days because of course we can all have an off-day or an exceptional day. Exams are timed and set in controlled conditions so that we can see the best and full range of what students can do. Without exams and moderated assessment and with little time to develop and communicate other assessment tools, there are a range of possibilities but there is no perfect solution. The worst case, which is what will happen if we do nothing, is that different teachers in different exam centres will have to decide for themselves what to do, which will not be consistent and may lead to inappropriate outcomes for progression. It would not allow Exam Boards to issue grades that they know are justifiable. The greater the inconsistency, the more likely it is that different groups of centres, or students are disproportionately impacted. Given that all solutions have weaknesses, at this late stage, Exam Boards can make improvements to that worst case situation, but the solution will be far from as reliable as assessing through unseen controlled examinations.

Exam centres need to be able to authenticate that work is the students' own work, which firstly means developing guidance on the conditions in which assessments have to be undertaken.

- The tighter the controls, the more assurance we can have of authenticity. The looser the controls, which might be needed due to Covid, the greater the risk that students work is not their own.

Teachers need to be able to draw on a range of defined evidence which is available to them to validate their understanding of the level that each student is working at. As the Secretary of State says: 'A breadth of evidence should inform teachers' judgements, and the provision training and guidance will support teachers to reach their assessment of a student's deserved grade'.

- A best fit approach is simple and places trust in teachers' professionalism, but more subjective and less consistent.
- More clearly defined weightings for the evidence helps consistency, but is less flexible so may not work in the large variety of contexts in which this will operate.

Teachers need to have a good understanding of how the evidence they are seeing in their own students' work relates to the grade standards that are being applied by others across the nation.

- Existing support materials and grading standards (exemplar work from historical exams) would be more readily understood but is harder to understand in a situation where the whole content has not been covered because teaching and learning has been disrupted.
- New support materials, optional and itemised evidence is less clearly aligned to common understanding of a grade and may lead to only the best evidence being used. This may not be truly reflective of a students' overall performance in a subject. Other evidence might help teachers form a holistic view.

Exam Boards cannot maintain standards in the same way it is possible with established assessments such as moderated coursework and exams. In the absence of these established assessments, the only consistency available is some form of Common Assessment.

- The more flexibility there is around assessment, the less it is possible to maintain standards and the less consistency there will be.
- Less flexible approaches that cover similar content to the whole exam provide less opportunities for teachers to adapt the content based on what they have taught and provide less opportunity to account for the loss of learning that has been driven by the pandemic but do provide a clearer view of the breadth of content coverage and suitability for progression.

- There are arguments on both sides as to the extent to which each of these approaches may be able to account for equalities issues, on the one hand, a more flexible approach allows teachers to account for the individual circumstances of students, on the other, such an approach is less consistent and by its very nature, unequal.

Exam centres and Exam Boards dealt with thousands of appeals in 2020. We have also spoken to hundreds of parents and students who had made allegations that exam centres were not able to make decisions free from bias or discrimination. The majority of these were not from students with protected characteristics. There was no evidence in most cases that these students had been subject to bias or discrimination in relation to other students in their class. Many had already secured places at top universities. We recognise both the workload and the pressure felt by teachers. There is a conflict to both motivate and reward individual students' performance in support of their progression, while accurately reflecting performance which may not be as good as some students and their parents hope. The exam system normally removes this pressure from teachers. Students tell us that they want the opportunity to demonstrate what they can do, and accept therefore that their grade is based on their own performance. It feels unfair to them that they should be graded on anything else, particularly the subjective judgement of someone else about what they might be capable of, therefore:

- Students must have access to a right of appeal.
- That right of appeal must involve both the exam centre that has made the original assessment, and the Exam Board as the quality assurance agency who issues the certificate.

Principles for awarding in 2021

We believe that a number of principles should be established to assist awarding in 2021. Many have been laid down by the Secretary of State and Chief Regulator, and these should be further informed by, and agreed with, stakeholders as an outcome from their consultation, of which this response forms a part.

- Awarding of GCSE, AS and A Levels in summer 2021 will be based on teacher assessments,
- Students will be assessed on what they have been taught, rather than against content they have not had a chance to study but this must be balanced against the need to ensure sufficient coverage of the curriculum so that they can progress with sufficient breadth of coverage of the content.
- Ofqual and DfE will need to explicitly define their expectations regarding the grades teachers must determine, in order that teachers have clarity and common understanding.
- A breadth of evidence from students should inform teachers' assessments.
- At the heart of the process is a Common Assessment to provide a consistent framework across exam centres.
- Teachers will be supported through the provision of training and guidance to support them to allocate appropriate grades based on the standard of the evidence produced by students.
- The objective of grades this summer is to ensure that students have agency in them (that their grade is based on the evidence of their work) to support successful progression and to secure public acceptance.
- The solution:
 - must include learner agency;
 - be deliverable by schools, colleges and Exam Boards;

- take account of the public health context and be future proofed against centres being unable to open in March, before Easter or by the summer.
- It must be recognised across the sector and by Higher Education Institutions that there is a change in the standards maintenance methodology for summer 2021 away from a comparable outcomes approach towards centres maintaining performance standards. This means that the distribution of grades is likely to be different (higher) than in previous years because maintaining standards in the form of setting grade boundaries has been removed as a result of the cancellation of exams (there are no grade boundaries to be set).
- Students must have a route to check the accuracy of the grades being submitted and to appeal their grade.

Supporting Teachers

Exam Boards will provide a supportive framework to help teachers make grading decisions. The framework will include both guidance, advice and materials to support assessments. This section focusses on those support materials.

A key element will be Common Assessments created from past papers. These will be teacher-marked, although some Exam Boards might offer an external marking service on an opt-in basis. In such cases, only raw marks (rather than grades) might be returned.

The use of such assessments provides assurance that a valid assessment of the subject is used to generate a teacher assessment. Assessments could be taken either in the exam centre or at home under controlled conditions. Completed assessments would then be retained by the exam centre, there would need to be declarations of authenticity and the conditions in which they were undertaken from the centre and student.

Common Assessments will be constructed from whole past papers provided by Exam Boards. There are many reasons why the use of past papers is to be preferred to the use of new materials. These are summarised in the table below:

	Past Papers	Live Papers
Training/ marking materials	YES	MUCH LESS
Support Package	YES	MUCH LESS
Familiar Format	YES	YES
Flexible enough to cover different topics	YES	NO
Lower Likelihood of Paper Error	YES	NO
Quicker delivery	YES	YES
Modified Papers Ready	YES	NO
Less opportunity for malpractice	YES	NO
Taken in unseen timetabled conditions	NO	YES
Resilient with uncertain school closures	YES	NO

Analysis by the Exam Boards suggests that the needs of almost all specifications can be met in this way. For a very small number of Phase 4 Product Reform specifications (minority languages/Biblical Hebrew), alternative arrangements may be necessary.

There are many benefits to teachers of using whole past papers. Support materials, in particular mark schemes and grade boundary data are aligned to whole papers. This would therefore be the recommended approach. There would need to be a clear rationale for adaptations to these in the centre policy which is quality assured by the Exam Board.

Support around the Common Assessments should be guidance-focussed, not rules-based, to maximise flexibility to address Differential Lost Learning and Teaching (DLLT) and minimise the administrative burden for teachers.

Common Assessments will not be timetabled, to maximise flexibility and to minimise challenge around “replacing exams with exams”. While test windows may have superficial attraction, they would actually serve little purpose as confidentiality is lost the moment the window opens, and windows would have to be reasonably lengthy to provide flexibility. We therefore recommend teachers have flexibility as to when students undertake Common Assessments. This will also allow students remote access, if, for example, teachers set a Common Assessment as part of an online Zoom lesson.

Supplementary support materials will include:

- mark schemes;
- grade boundaries;
- standardisation materials where available;
- exemplar materials;
- archive scripts;
- performance and grade descriptions – could be of use in some subjects (e.g. Maths and Science) but less so in others;
- data by question level; and
- modified question papers.

Grading

Basket of evidence

The Secretary of State outlines that ‘a breadth of evidence should inform teachers’ judgements, and the provision of training and guidance will support teachers to reach their assessment of a student’s deserved grade.’ It is therefore proposed that there is a range of evidence upon which a teacher assessed grade is determined; to include a Common Assessment together with other forms of assessment evidence using a multi-evidential approach to grading students work to arrive at the final internally quality assured outcome. It is reliant on the knowledge of the individual student by the teacher but is supported by a Common Assessment and support materials provided by Exam Boards which can be called upon for sampling, as required.

The Common Assessment would be a vital tool for promoting consistency and understanding of the grading standards. The Common Assessment should be a paper selected from the assessment materials provided by the Exam Boards. In selecting the assessment, teachers should take account of what has been taught, therefore using the assessment that best represents the breadth and depth of what has been studied. and teachers should take account of what has been taught. While there may be certain unforeseen exceptional circumstances where it might not be possible to use the Common Assessment, an alternative to this that achieves the same ends would need to be demonstrated as part of the centre policy and quality assurance process. The Common Assessment is a vital piece of evidence to support the appeals process and the QA process for exam centres because it provides objective evidence on which the grade is based. There may be individual students that have exceptional circumstances as to why they may not be able to sit the Common Assessment but that these could be overcome in another way, such as special consideration.

Exam Boards will issue guidance to centres on the types of acceptable evidence that teachers could use in determining the final grade to award a student from the following:

1. Exam Board Common Assessment
2. Non-Examined Assessment (NEA)
3. Mock assessments
4. In centre structured assessments
5. Practical performances or creations – where different to NEA
6. Classwork

Exam Boards will provide a proforma to enable centres to consistently record the additional evidence they have considered, along with confirmation of the conditions under which the work was completed. This proforma could also gather details of access arrangements for each student.

Content coverage

The Secretary of State sets out that the ‘breadth of evidence should inform teachers’ judgements, and the provision training and guidance will support teachers to reach their assessment of a student’s deserved grade’. Whilst it is expected that assessment of student performance will reflect the content of the specification, the potential for lost learning needs to be accounted for in the overall assessment. Having achieved these grades, students will make progress to the next stage of learning. They are more likely to succeed if the grade accurately reflects their performance over the breadth of the course and less likely to succeed in their next stage of learning if the content has been narrowed. Exam Boards will therefore provide support materials that exemplify grade standards, and the centre policy should explain how the breadth of evidence will be drawn together to award the grade, taking into account the specific circumstances of the students at the centre. Exam Board

guidance and exemplification would cover, at a subject level, the range of skills, content and assessment objectives that are demonstrated at key grades.

It is not proposed that Exam Boards define a proportion or percentage of content coverage that is acceptable in a given subject, as this may lead to a narrowing of teaching and learning and in turn, of assessment. In addition, a percentage of coverage is likely to be an arbitrary measure which could be interpreted and used differently between teachers and centres. The quality assurance process requires a confirmation of their approach to specification coverage and an assessment of whether the coverage is of sufficient breadth and depth to allow students to successfully progress.

One concern might be that the existing grade boundaries are set at the standards from 2019 and before. Given that outcomes were higher in 2020, some have expressed a view that grade (performance) standards should therefore be re-calibrated to match this. It is important to remember that exam centres were asked to apply the known grading (performance) standards (2019 and before) in 2020 and that this resulted in the outcomes that we saw in 2020. If Exam Boards were to ask centres to re-calibrate their performance standards to that seen in 2020 then it is more likely that there would be higher outcomes beyond those seen in 2020.

Example process for using Common Assessment

1. Students sit the Common Assessment paper that allows for the most range of content that has been taught to be assessed.
2. Once this has been selected by the centre, they would be able to use the corresponding standardisation pack that was used from the marking series. Before marking the papers, they must confirm that they have read the mark scheme and the corresponding standardisation materials for that assessment. They must confirm this to the Exam Board OR attend one of the pre-recorded/live events as part of the support and quality assurance process.
3. Students would then sit the Common Assessment.
4. Teachers would mark the Common Assessment in their centres. Where possible, centres should conduct their own internal quality assurance process aligned to their policy. This could be undertaken by another teacher or Head of Department. (Some Exam Boards may be able to offer an additional marking service to help reduce the workload for teachers and to provide more confidence in the standard).
5. After the marking and quality checks have taken place the student will have a mark for that paper e.g., 42. This can then be checked against the qualification level OR notional grade boundaries to receive an 'estimated standardised grade' for that paper.
6. Exam centres would then access other support materials such as the examiner reports, item level data, national and historical data, exemplar materials and training packs that give an explanation as to the levels of work seen. **Note, this could be a required step to be aligned with no.2.
7. Exam centres would then refer to the proforma referenced above.

Evidence for grading - example

Classwork	B
NEA	C
Common Assessment	Mark of 42 - C
Termly assessments	Average B

Teachers should arrive at the final grade in accordance with the context of their centre, the support materials provided by the Exam Boards and aligned to their centre policy which has been quality assured by the Exam Board.

One approach might be that the teacher's overall view is that student is awarded a grade C. This is based on the view that they can achieve higher standards when the work and environment is more structured, and they are given more support. The Common Assessment and NEA are more reflective of their abilities when assessment is independent and not supported.

Alternatively, in a different context at a different school, a teacher might consider that the student was unable to access the full curriculum because exam centres were closed. They achieved lower on the Common Assessment because these covered some specific topics that it had not been possible to cover in class. The topics that had been covered in the Common Assessment were awarded at the level of a grade B. The teacher assesses that the student has accessed sufficient breadth of content and is achieving a consistent level of performance to be able to progress confidently. Given this context, they award a grade B.

Quality Assurance

Exam Boards will provide a Quality Assurance framework to support centres in the award of grades, to underpin the whole system and to provide public confidence. The Quality Assurance framework will be front loaded, will focus on prevention, rather than detection, although detection measures will form a part. The support materials provide the key element of the Quality Assurance framework and are described in more detail in section 1 above. The whole framework is illustrated below.



Training – On-screen marking training / Bias and Discrimination

Exam Boards will provide a comprehensive support package covering:

- The centre policy on awarding grades (see section 2C), according to the guidance from Exam Boards;
- Marking of the Common Assessments.

Exam Boards will provide a range of supplementary support materials to aid teachers in this area including:

- mark schemes;
- grade boundaries;
- standardisation materials where available;

- exemplar materials;
- archive scripts;
- performance and grade descriptions – could be of use in some subjects (Maths and Science) but less so in others; and
- data by question level.

Exam Boards will also provide online marking training tools (where available) allowing teachers to practise marking and permitting internal standardisation within centres, such as:

- converting marks to grades (see section 3);
- taking account of students with special educational needs; and
- avoiding bias and discrimination in marking.

Exam Boards will provide an online training module giving guidance to teachers on how to avoid bias and discrimination in their approach to grading.

Centre policy for awarding grades

Centres will be required to develop a policy on their approach to the award of grades, taking into account the support and guidance provided by the Exam Boards. The policy will cover:

- Details of the basket of evidence centres intend to use to inform their grade decisions, including:
 - Common Assessments;
 - Mock papers;
 - Non Examined Assessments;
 - In centre structured assessments e.g. topic tests;
 - Other appropriate student work, e.g. projects, homework assignments;
 - Past performance data.

- Confirmation as to whether or not Common Assessments have been attempted and, an explanation as to why if they have not been used, as well as details of the appropriate alternatives use instead.
- Confirmation of their approach to specification coverage and an assessment of whether the coverage is of sufficient breadth and depth to allow students to progress.
- Confirmation of their approach in relation to differential lost teaching and learning.
- Where Common Assessments have been used;
 - confirmation of their approach to marking training;
 - confirmation that internal standardisation has taken place.

- Confirmation of their approach to grading.
- Confirmation and details of measures they have taken to avoid bias and discrimination in their marking and grading.
- Head of Centre Declaration of overarching compliance with, and their confidence in the Centre Policy.

- The Centre Policy should **not** be an exhaustive restatement of a centre's general Internal Quality Assurance Policies. It should be a succinct document focussed on the process of awarding grades.

Centre-level Review

The centre-level review could take one of two forms:

- A paper-based review of the Centre Policy and associated documentation or;
- A review of this documentation through a virtual visit.

JCQ recommends the former approach as it best enables proportionate and targeted use of resources.

The centre-level review will be confirmatory and will look to endorse the centre's Policy and approach. In instances where that was not possible due to concerns generated by the submitted Centre Policy or raised in other ways Exam Boardss would move to a second-level review.

The centre-level review is process-focussed and looks to validate the centre's approach to the award of grades. It would consider all of the evidence, or the absence of evidence, contained in the Centre Policy.

An appropriate trained cadre of staff would be required to undertake this activity, which would be undertaken on a cross-Exam Board basis to minimise the administrative burden on centres. Proven models for this approach include the Centre Inspection Service and the validation process for A-level Science Practical Endorsements.

An even simpler approach, which would reduce centre administrative burden and assist process completion would be for Heads of Centres simply to confirm their confidence in the Centre Policy through a Head of Centre Declaration. This would simply be received by Exam Boards, and chased up where it had not been, and would allow the focus of all resource on more targeted second-level reviews. JCQ would recommend careful consideration of this suggestion.

Second-level Review

Second-level reviews will remain supportive with the aim of assisting centres to provide valid grades. The aim should be to support centres to put the best possible system in place. It will also be a mechanism to try to avoid the submission of over-inflated grades, albeit with limitations.

The second-level review will be undertaken by a virtual visit, to future-proof against ongoing public health restrictions. The virtual visit will take place between Exam Board staff/contractors and senior staff at the exam centre. It will take the form of a professional conversation. This stage may require subject expertise in the meeting, as evidence underpinning the Centre Policy, in particular the marking of the Common Assessment, may be considered.

Second-level reviews would occur in one of three ways:

- As a result of concerns regarding the Centre Policy, arising from the centre-level review;
- As a result of targeted, risk-based Quality Controls;
- As a result of random sampling undertaken as a further Quality Control (see section 2E below).

An alternative to the current proposal on looking at Common Assessments on appeal, might be to have a review of Common Assessments here on a sample basis. This could allow us to require centres to improve their process, and review their intended grades **before or after submission**.

The outcomes of the second-level review will either be the centre undertaking revisions to its grades, either before or after submission, **or** the Exam Board expressing itself satisfied at the Centre Policy and approach, **or** further investigation. In the last case, in exceptional circumstances Exam Board may authorise the withholding of results. Such cases, which will be rare, for example alleged or proven malpractice, are likely to be transferred to the appropriate section for a continuing investigation (see section 2E below). It is not anticipated that Exam Boards will themselves determine grades at any stage, although there may be exceptional circumstances which may require this.

Quality Controls

Quality checking will be Exam Board driven and risk-based. They will focus on:

- Centres identified through statistical analysis of previous years' results;
- Centres identified in other ways;
- Centres which might over-compensate for not being generous enough last year;
- Centres identified as being of concern through the centre-level review leading to a second-level review;
- In addition, there will also be random sampling from a range of centres as a further quality control.

The outcomes of the Quality Controls will either be the centre undertaking revisions to its grades, either before or after submission, **or** the Exam Board expressing itself satisfied at the Centre Policy and approach **or** further investigation. In the last case, in exceptional circumstances Exam Boards may authorise the withholding of results. Such cases, which will be rare e.g. for example alleged or proven malpractice, are likely to be transferred to the appropriate section for a continuing malpractice investigation. It is not anticipated that Exam Boards will themselves determine grades at any stage, although there may be exceptional circumstances which may require this.

Appeals

Context for appeals

The **appeals process in summer 2020** was re-engineered and implemented at great speed alongside the release of results. Consequently there was minimal buy-in and understanding of the process from students, parents and teachers when it was launched. Some elements of the process were unnecessarily burdensome, e.g. making changes to grades as a result of centre error, and others were insufficiently clear to enable cases to be closed, generating a huge volume of complex paperwork. The blurring of the appeals and malpractice processes in relation to cases of bias and discrimination was the most problematic issue in this regard and in some instances created a toxic atmosphere between parents/students and exam centres.

The **process for assessing students in summer 2021** will be different from summer 2020. In his letter of 13 January to the Chief Regulator, the Secretary of State outlined that students should be ‘assessed based on what they have learnt, rather than against content they have not had a chance to study.’ The DfE/Ofqual consultation proposes that the process will be focused on teachers assessments of the evidence of the standard at which their students are performing.’ With this context in mind it is important to consider that for the purpose of appeals it will be difficult to find someone who can put themselves in the position of the teacher in order to re-mark or comment on the marks given to a student given that only the teacher has followed a student’s progress throughout their course. Any process that is put in place for appeals will have to have teachers/centres at the heart of it, and any changes to academic judgement will have to be made in collaboration with them and only if the original ‘grades cannot be justified, rather than as a result of marginal differences of opinion,’ as the Secretary of State said about the external quality assurance process in his letter of 13 January. There may of course be exceptions to this in relation to egregious cases of malpractice.

Areas of focus

It’s critical that this year’s appeals process is designed to avoid the problems experienced in summer 2020 and is appropriate for the way in which students will be assessed. With these two aims in mind we suggest that a successful appeals process will require that we:

- **communicate quickly and clearly how students will be assessed**, in particular the evidence that will be used and what will be expected of teachers to ensure judgements are sound, e.g. the QA;
- **communicate the role that exam boards will play** in ensuring judgements are sound;
- **give students a sense of agency** in their results by ensuring they understand the evidence that will be used and how they can make the most of the remaining opportunities they have, e.g. via student discussion, student proformas and reviews;
- create a simple process with **clear outcomes and deadlines** to ensure decisions can be taken in time to ensure students can progress and the system isn’t bogged down in appeals that are impossible to resolve;
- have a **streamlined approach** to record keeping and administrative changes, e.g. centre errors and amendments as a result of special considerations and access arrangements;
- **support teachers** to avoid the issues that are most likely to drive appeals and to make the appeals process as smooth as possible when it is necessary;
- ensure any student who is concerned that the process has not been applied fairly in their case can submit an appeal to the Exam Board for a procedural check – this will cover **bias and discrimination**.

Proposed process

The proposed process falls into the following three phases:

1. Pre teacher assessment
2. Post internal QA of teacher assessment
3. Post results provided by Exam Board

1. Pre teacher assessment

The foundations of a successful appeals process this year will be found in all the activity that takes place before teachers assess their students, for example:

- the conversations teachers have with students to set their expectations early on about the evidence that will be used, their current performance and the work that they can do to generate further evidence
- the support, training, and QA processes that will be designed to ensure its clear how students will be assessed and how teachers should secure student input into any issues with the evidence that will be used to assess them
- the support provided by Exam Boards to help teachers record conversations and/or decisions so they can be drawn on for any reviews or appeals, e.g. the proformas.

2. Post internal QA of teacher assessment

Once teachers have assessed their students, and their centres have completed their internal QA process, this proposal suggests that within a defined period a student has the opportunity to review their proforma to:

- identify any factual errors which they can ask the centre to review, e.g. marks for an assessment, details of access arrangements
- request a review of the teacher's marking (as currently takes place with NEA).

Were the proforma to include the student's proposed/provisional grade, then the students could appeal the grade if the centre has not followed the rationale/process documented in reaching their grade based on the assessment evidence. If a review is requested on the grounds of academic judgement, the centre could allocate an independent reviewer to review the evidence used in determining the final grade. The independent review could be another teacher at the centre not involved in the original marking. However, there are challenges with determining a valid approach particularly if the Common Assessment is not mandatory and there is a flexible approach to the use of evidence because it will be impossible to find someone else who has followed a student's progress through the course and be able to put themselves in the position of the teacher in order to re-mark or comment on the marks given to a student. Any changes to academic judgement in response to this review will have to be made in collaboration with teachers/centres with the possible exception of egregious cases of malpractice.

Students would not be allowed to appeal on the basis that they do not agree with the rationale or that they consider some evidence should not be considered/other evidence should be considered. Centres will need to have considered if they exclude assessments for a student which have been considered for other student, if for example the student was adversely affected when an assessment was conducted.

3. Post results provided by Exam Boards to UCAS and students

Once the Exam Board has released results to UCAS and to students, this proposal suggests that within a defined period a student has the opportunity to:

- identify any factual errors which they can ask the centre to review, e.g. from the proforma or as a result of the centre incorrectly submitting data to the Exam Board
- request an Exam Board to conduct a procedural review.

If the student identifies an error in the information in the pro-forma that was not identified prior to the centre submitting the grade and the centre is in agreement, it would submit an administration correction request on the grounds of centre error to the Exam Board. The Head of Centre would be required to sign a declaration. This would be a streamlined process by the Exam Boards.

Where an Exam Board conducts a procedural review and upholds the appeal, the Exam Board may request that a centre reviews its internal quality assurance on the grading decision.

Timeline

The DfE/Ofqual consultation proposes that results are released in early July to create ample time to correct errors and conduct appeals where necessary. Our engagement with teacher associations and teacher unions suggests this is not workable and that they would prefer to share marks with students for the evidence that will be used in the remaining months of the course and have results days scheduled as normal. To make this work the second phase of the process (post internal QA of teacher assessment) would need to take place prior to the submission of grades to the Exam Board (18 May to 18 June) or after it (18 June to 21 July). We need to engage further with stakeholders on these options and on timescales more broadly to ensure they are deliverable across all processes but our initial proposed process timeline is outlined in the table below.

Stage	Activity	Window
1. Post internal QA of teacher assessment		
Internal review (run by centre)	Candidates receive their pro-forma and identify factual errors which they can ask to be reviewed. Candidate challenges decisions and centre conducts review (e.g. marking).	Prior to submission of grades to boards (18 May - 18 June) or After submission of grades to boards (18 June to 21 July)?
2. Post results provided by Exam board to UCAS and students		
Error correction (run by Exam Board)	Exam Boards to run an administrative process for amending errors at the request of centres including any identified as a result of a late student challenge following issue of results.	For GCE submitted to Exam Boards by 26 August to ensure HE/UCAS deadline can be met. For GCSE submitted to Exam Boards by 2 September or later.
Post-results student appeal (run by Exam Board)	Exam Boards to conduct a review of centre procedures at the request of students (via the centre), including conduct of any internal reviews. If the appeal is upheld, the Exam Board may request that a centre reviews its internal quality assurance.	

Private Candidates

Some private candidates may have an existing relationship with a centre sufficient to allow them to generate an appropriate body of trusted evidence and therefore be assessed on the same basis as other candidates. This might be the case, for example, where a private candidate has studied with an established distance learning provider which has links to a recognised exam centre. We should permit private candidates to be assessed on a basket of evidence, in the same way as other candidates, in these circumstances.

However, many private candidates will not be in this position. For those private candidates who have studied independently or with a private tutor, it would be extremely challenging for a centre to validate a broad basket of evidence - any such portfolio likely would not be directly comparable to that of a centre's other students, to the extent that a common standard could be established, and neither could the centre be confident that the work is the candidates' own - this is likely to deter many centres from offering a service to private candidates. We strongly believe, therefore, that for private candidates who have studied independently a centre should be permitted to submit a grade on the basis of a single assessment covering an appropriate proportion of the specification which can be completed under centre supervision (either in centre or supervised remotely) alongside the centre's internal candidates. This assessment could be a past paper. This approach is most likely to ensure that as many private candidates as possible are given the opportunity to obtain a grade this summer which is based on objective evidence of their performance.

If the approach above is adopted, we believe that a range of centres may be willing to offer support to private candidates – including mainstream exam centres as well as more specialist distance learning providers. We believe the interests of private candidates would be best served by encouraging the broadest possible range of centres to accept private candidates and offer them the opportunity to sit an assessment alongside their own candidates. We commit to working with centres to support them in doing so and would urge DfE and Ofqual to consider what encouragement they might also offer to centres.

In order to ensure that the grades awarded to private candidates are as valid as possible, the assessments used should meet the minimum specification coverage requirements set for candidates generally. Centres should not be asked to validate a broader range of evidence for private candidates, where that evidence has been produced independently or under the supervision of a private tutor.

We also suggest further investigation with some of the major distance learning providers be undertaken, as they are likely to be part of any comprehensive solution.

We do not recommend that an Exam Board marking option be offered for private candidates if this is not also provided to other candidates, as it could lead to a perception of unequal treatment and would also necessitate different appeal routes for the two groups of candidates.

We do not believe it would be appropriate to offer private candidates the opportunity to sit formal examinations in the summer while exams remain cancelled for other candidates. This would create an inequality of treatment for the two groups of candidates, would strongly disadvantage certain groups of private candidates (for example, those who are shielding) and would undermine public confidence in the treatment of candidates this summer. We also believe it would be impossible to guarantee a network of exam venues of sufficient geographical spread to ensure that all private candidates could be offered an exam venue within reasonable travelling distance of their home, since exam centres would not be arranging examinations for their internal candidates. Finally, it would be extremely challenging to set standards in such a way as to ensure parity between private candidates and their peers receiving teacher assessed grades.

It would be possible to offer private candidates an opportunity to sit examinations in the autumn if this were done as part of series open to all candidates unhappy with the grades they received in the summer. However, an autumn series would not suffice as the sole offer for private candidates as it would not allow them to progress to their next steps in education or employment at the same time as their peers.

Equalities

The Exam Boards will work with exam centres to ensure that all students are treated as fairly as possible. We will work collaboratively with stakeholders to ensure that, as far as possible, arrangements put in place for the awarding of qualifications this summer do not disadvantage students with protected characteristics.

The vast majority of qualification specifications have remained unchanged, so there is no significant difference in the content students will cover during their course of study.

As in a normal series, the assessment undertaken by students at the end of their course will sample from a range of the skills, knowledge and understanding contained within the qualification specification. Different arrangements are being put into place this year to account for:

- a reduction in teaching and learning, especially face-to-face teaching
- public health guidance restricting students' ability to undertake fieldwork, practical, and group work.

Once final decisions have been reached, following the current DfE and Ofqual consultation, Exam Boards will ensure that the final arrangements for their qualifications minimise, or where possible remove, any potential adverse impact on students who share particular characteristics. We are committed to:

- ensuring assessment of learning and quality assurance procedures are sensitive to the needs of all students, whilst not compromising fairness and consistency of approach
- providing arrangements to meet the needs of disabled students and/or those with additional support needs without compromising integrity.

We will provide training and guidance to centre staff which focus on the following areas:

- ensuring that students with approved access arrangements are accommodated appropriately
- how centres can take account of any illness students may be experiencing, or any other personal circumstances outside their control, at the time they are producing evidence that will be used in determining their final grade
- providing training and guidance to centre staff on how to avoid conscious and unconscious bias when making final grading decisions.

Delivery, timelines and critical path

Delivering the programme, as outlined above will be challenging to ensure centres are able to submit student grades by mid-June. Sufficient time is also required to:

- facilitate teachers and centres to be able to hold the Common Assessment, prepare the basket of evidence and maximise learning time as requested by the Secretary of State;
- allow Exam Boards to prepare appropriate Common Assessments and support materials;
- allow for adequate QA processes up front (first-level QA) and subsequent second-level review as outlined earlier in this paper; and
- allow for the appeals process as laid out earlier.

The DfE and Ofqual consultation proposed a results day in early July. We question the purpose of such an early date and impact this will have on centres – it will also create an inequality across the UK in terms of HE and FE progression.

After careful consideration the JCQ firmly believes that results days should be as originally scheduled prior to the on-set of the Covid-19 pandemic, namely 19th August 2021 for A and AS Level and 26th August for GCSE, with results provided to UCAS seven days before the 19th August as in a ‘normal’ year. The reasons for this proposal are three-fold.

- First, teacher associations have told JCQ they would strongly prefer a normal results day, as teachers would not be available in July and early August to manage the appeals process. Many, if not the vast majority, of teachers have not had sufficient rest following what has been a couple of very intensive and challenging years.
- Second, Exam Boards are likely to continue to require contact with centres in July and August to resolve errors and other queries.
- Third, it would ensure as level a playing field as possible across the UK for HE entry and other routes of progression for students.

JCQ would be happy to explore further if early release of results to exam centres for final quality assurance checks prior to the results days for students, will be beneficial.

JCQ and the Exam Boards are working collectively to understand the critical path and timelines to deliver a successful results season as requested by the Secretary of State. The timelines to achieve this can only be finally confirmed after the final decisions of Ofqual and DfE are known after the consultation and the process needs to be considered holistically. This is critical as even an apparently small change or demand early on in the awarding cycle will have significant knock-on effects all the way through the development of support materials, centre collation of the portfolio of evidence, grade submission, quality assurance reviews, results days and appeals.