

# Consultation on how GCSE, AS and A level grades should be awarded in summer 2021

## Introduction and overview

Please confirm that you have read the accompanying consultation document

I have read the consultation proposals

## Your data and rights

Name

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Q1. To what extent do you agree or disagree that the grades awarded to students in 2021 should reflect the standard at which they are performing?

Disagree

Q2. To what extent do you agree or disagree that the alternative approach to awarding grades in summer 2021 should seek to encourage students to continue to engage with their education for the remainder of the academic year?

Neither agree nor disagree

Q4. To what extent do you agree or disagree that teachers should be able to use evidence of the standard of a student's performance from throughout their course?

Strongly agree

Q5. Should there be any limit on the period from which previous work could be drawn?

No

Q7. Do you have any comments on when students should be assessed?

There is no provision in the proposal to account for differential learning loss. Although UCU strongly agrees a grade should not be made on a prediction of what a student may have achieved in an exam, the statement that the grade should reflect the 'standard at which they are performing' does not seem to allow for consideration of past performance that is stronger and has dropped due to the effects of the pandemic. There is a difference between reflecting the standard at which a student is performing at the time of the assessment, in what they have shown themselves to be capable of in the past, and what they could have achieved without the disruption and learning loss caused by the pandemic. Mitigating circumstances must be taken into account.

To ensure that students are assessed fairly to account for differential learning loss a fair and final assessment must take into account a range of factors such as students' accessibility to remote learning, mental and physical health and other personal issues throughout the year. Assessment must be weighted to reflect the strongest performance and should not be weighted to favour work from the end of the course over earlier work.

In the short time we have remaining to prepare for teacher assessed grades for we must ensure that very focussed, relevant and necessary teaching and learning activities are delivered. There must not be undue pressure on staff and students to complete work just for the purposes of assessment in the final portion of the year. Furthermore our members' experience last year was that management requested a plethora of unnecessary information for the purposes of assessment. We must not overload practitioners with inessential data gathering and other similar demands, and the department must set clear expectations about this.

Q8. To what extent do you agree or disagree that the exam boards should provide a set of papers to support teachers in assessing their students' work?

Strongly disagree

Q9. Do you think the use of the papers provided by the exam boards should be compulsory or optional, for GCSEs, AS and A levels?

	Compulsory	Optional
All A level		X
All AS		X
All GCSE		X
GCSE English language		X
GCSE mathematics		X

Q10. To what extent do you agree or disagree that any papers provided by the exam boards should include questions that are of a type that is familiar to students?

Neither agree nor disagree

Q11. To what extent do you agree or disagree that if teachers use exam board papers they should have choice about the topics covered in the questions their students answer, for example through choice of which papers they use with their students from the set of papers provided?

Neither agree nor disagree

Q12. To what extent do you agree or disagree that teachers should be required to assess (either by use of the exam board papers or via other evidence) a certain minimum proportion of the overall subject content, for each subject?

Disagree

Q13. To what extent do you agree or disagree that teachers should mark any papers their students are asked to complete?

Neither agree nor disagree

Q14. Do you have any comments on the use of exam board papers?

We are concerned that the proposal to provide exam board papers will just turn into exams in another guise, and would carry undue weight in the breadth of evidence assessed, particularly if they are mandated. UCU does not believe that any form of end of term exam should be mandatory. Exams, as is well documented, increase anxiety and stress among students. Given the increase of mental health issues among students, which have been exacerbated by the pandemic, it would be remiss of the government to add to these problems by requiring unnecessary exams. Other evidence must be allowed to be used instead and will be a fairer way of students proving what they can do.

Our concern about specifying a minimum proportion of subject content is that for students who have suffered extreme disruption they risk having to cram the required knowledge into a short period of time, which does not make for effective learning, increases stress for teachers and students and does nothing for the student's longer term progress in the subject. Subject knowledge is of course important, so that is why UCU advocates a comprehensive catch-up and transition support package for students.

There are also practical considerations to account for, such as public health guidance and social distancing requirements at the time, local restrictions or even outbreaks at institution level that would make it difficult to run the exam board paper assessments in a manner that is fair to all students and which does not place undue pressure on staff to enter unsafe workplaces.

UCU is also concerned that any approaches must account for equality considerations which may place certain students at a significant disadvantage but which would be more difficult to mitigate for with a standardised exam board paper.

Q15. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in full for a subject?

Agree

Q16. To what extent do you agree or disagree that teachers should take account of a student's performance in any non-exam assessment where that has been completed in part for a subject?

Agree

Q17. To what extent do you agree or disagree that teachers should mark their students' non-exam assessments?

Agree

Q18. To what extent do you agree or disagree that the marking of non-exam assessments should not be moderated by the exam boards this year?

Agree

Q20. To what extent do you agree or disagree that a breadth of evidence should inform teachers' judgements?

Strongly agree

Q21. To what extent do you agree or disagree that the provision of training and guidance from exam boards should support teachers to reach their assessment of a student's deserved grade?

Agree

Q22. To what extent do you agree or disagree that teachers should be able to take into account other performance evidence for a student before submitting a grade?

Strongly agree

Q23. To what extent do you agree or disagree that performance evidence from closer to the time of the final assessment, should carry more weight in determining a student's final grade?

Strongly disagree

Q24. Do you have any comments on the use of other performance evidence?

UCU strongly supports the use of other performance evidence. The coronavirus crisis has shown that relying on external examinations as the sole mode of assessment is inadequate as a measure of student achievement. UCU believes the evidence used should be wide ranging and allow the teacher to support the student in providing evidence of their strongest work and capabilities. Teachers' professional judgements should be valued and respected.

UCU believes that the turmoil caused by the cancellation of exams is an opportunity to wholly rethink our assessment system. We have long called for a change to our linear qualifications system because of the negative effect it has on teachers and students. Instead of treating exams as the ultimate gateway to jobs or further and higher education, we should look at developing skills and knowledge through project based work and modular assessments giving students a chance to prove their real abilities.

The obsession with exams has forced students to follow narrowly based criteria to pass exams at the expense of developing the ability to think critically and be creative. A more creative curriculum that allows for professional autonomy and moves away from teaching to the test will help engage a wider range of students in their learning and give them a better chance of succeeding in achieving their ambitions. UCU advocates project based work that develops students' skills and knowledge in a rounded way using a variety of assessment methods. We believe that the department should take the opportunity to engage more widely with the sector around the principles of assessment and forge a consensus about how we can move forward to a fairer, more imaginative model of assessment that prepares students better for their future choices.

Q25. To what extent do you agree or disagree that all students should be assessed within a given time period for each subject – whether or not their school or college must or is using exam board papers?

Disagree

Q26. To what extent do you agree or disagree that exam boards should publish all of their papers shortly before the assessments in order to manage the risk of some students being advantaged through papers being leaked?

Neither agree nor disagree

Q27. Do you have any comments about the assessment period for the use of exam board papers or teacher devised assessments?

The risks identified in the consultation paper are actually another argument against providing exam board papers. It would not be possible to mitigate against the unfairness of some students seeing the content of the paper ahead of their assessment time, or having more time before sitting the paper. If the permitted window was very narrow it would not be able to account for the variability of local disruption. We just cannot guarantee fairness for all students and therefore we should not restrict the assessment period.

Q28. To what extent do you agree or disagree that the assessments should, if possible, be taken within the student's school or college?

Neither agree nor disagree

Q29. To what extent do you agree or disagree that if the pandemic makes it necessary a student should be able to take their assessments at an alternative venue, including at home?

Neither agree nor disagree

Q30. Do you have any comments on the conditions under which students should be assessed?

It is simply not realistic to expect students to be able to recreate an exam environment at home. Even for students who have the necessary access to reliable technology, the realities of homeworking are such that interruptions and distractions cannot be guaranteed not to occur. So an assessment taken at home would need flexibility over time and duration, but this is not what is proposed. There would then also be a disparity between students who are able to sit the paper at their school or college, and those who are at home or elsewhere.

Q31. To what extent do you agree or disagree that the exam boards should provide support and information to schools and colleges to help them meet the assessment requirements?

Agree

Q32. To what extent do you agree or disagree that the exam boards should set requirements for school and college internal quality assurance arrangements and provide guidance on these requirements to support centres?

Neither agree nor disagree

Q33. To what extent do you agree or disagree that the head of a school or college should make a declaration to the exam board confirming its requirements had been followed and teachers had regard to the guidance and support materials provided?

Neither agree nor disagree

Q34. Do you have any comments about internal quality assurance?

As stated for question 7, internal processes should be focussed and streamlined and not overburden teachers.

Q35. To what extent do you agree or disagree that the exam boards should quality assure how schools and colleges are determining grades?

Neither agree nor disagree

Q36. To what extent do you agree or disagree that the exam boards should quality assure the overall approach for all schools and colleges?

Neither agree nor disagree

Q37. To what extent do you agree or disagree that the exam boards should sample, at subject level, the evidence on which the submitted grades were based?

Neither agree nor disagree

Q38. To what extent do you agree or disagree that the exam boards should target their more in-depth quality assurance activities?

Agree

Q39. To what extent do you agree or disagree that exam boards could only change a student's grade after a review of the evidence and discussion with the school or college?

Strongly agree

Q40. Do you have any comments about external quality assurance?

Centres and teachers need to be given information from exam boards about their expectations as soon as possible. We agree with a partnership approach to external quality assurance. Teachers are committed to enabling their students to achieve the best possible result in a way that is fair and transparent, and external quality assurance should not act as a brake on achievement or progression.

Q41. To what extent do you agree or disagree that students should not be told the grade their teacher has submitted before results day?

Neither agree nor disagree

Q42. To what extent do you agree or disagree that students should be able to appeal their grade on the grounds that their teacher made an error when assessing the student's performance?

Agree

Q43. To what extent do you agree or disagree that the school or college should consider the appeal?

Neither agree nor disagree

Q44. To what extent do you agree or disagree that the appeal should normally be considered by a competent person within the student's school or college who was not involved with the original assessment?

Disagree

Q45. To what extent do you agree or disagree that a school or college should be able to appoint a competent person from outside of the school or college to consider the appeal?

Agree

Q46. To what extent do you agree or disagree that a grade should only be changed if it is found not to represent a legitimate exercise of academic judgement?

Disagree

Q47. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not follow the exam board's requirements when it assessed the student's performance?

Agree

Q48. To what extent do you agree or disagree that a student should be able to appeal to the exam board on the grounds that the school or college did not properly consider the student's appeal?

Agree

Q49. To what extent do you agree or disagree that we should seek to bring forward results day(s), in order for appeals to begin earlier?

Neither agree nor disagree

Q50. To what extent do you agree or disagree that if results day are brought forward, we should seek to decouple when a student is informed of their results, and universities are informed of their formal result for the purpose of admissions decisions?

Agree

Q51. To what extent do you agree or disagree that the exam boards should provide information for schools and colleges on how they should handle appeals?

Agree

Q52. Do you have any comments on the proposed appeal arrangements?

All students and their advisors should be clear about their rights. Unlike their wealthier peers, students from lower socio-economic groups are less likely to appeal their grades. A UCU-ComRes report (2014) highlighted that social class and school attended is associated with the level of information, advice and guidance a young person receives. For older and mature students the access to advice and guidance is even more patchy and uneven, where it exists at all. This disproportionate access to information, advice and guidance for students from disadvantaged backgrounds and mature students means that clarity and impartiality over the communication of the appeals process is imperative. UCU also strongly believes that a no-detriment position is necessary, whereby no student will receive a lower grade or award should they take up an appeal.

The proposed appeals arrangements have the potential to significantly increase teacher workload. If teachers are required to consider appeals for their own or other centres, their other duties need to be reduced or temporarily suspended. The relationship between teachers and students also needs to be considered. It is based on trust and mutual respect. This relationship could be strained by the appeals process being run by teachers within the same institution as the student, and so appeals should be run independently. This will also give students greater confidence that their appeal is likely to be heard fairly.

The document is unclear about the proposed timeline of results/appeals and how this interacts with offers from progression destinations. We note that last year an earlier results day was also mooted but this did not happen, and the impact on whether students met the conditions of their offers held contributed to the stress and upset caused by the failed system of awarding grades. UCU supports a post-qualification admissions system, but in the meantime, all parts of the system should work together to ensure that the process is as seamless as possible and that stresses of securing a destination are minimised. This includes the harmonisation of vocational and technical qualification results with general qualification results, and ensuring that the four home nations results and appeals processes are aligned so that no students are advantaged or disadvantaged in securing their destination places.

Q53. To what extent do you agree or disagree that private candidates should be able to complete the papers set by exam boards, with them marked by the exam boards?

Agree

Q54. To what extent do you agree or disagree that private candidates should be able to work with a school or college to produce the same type of evidence as the school or college's other students?

Neither agree nor disagree

Q55. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in summer 2021?

Strongly disagree

Q56. To what extent do you agree or disagree that exam boards should run normal exams for private candidates in autumn 2021?

Strongly disagree

Q59. Should the exam boards be prohibited from offering GCSE, AS and A level exams in any country in 2021?

Yes

Q61. Do you believe the proposed arrangements (any or all) would have a positive impact on particular students because of their protected characteristics?

No

Q63. Do you believe the proposed arrangements (any or all) would have a negative impact on particular students because of their protected characteristics?

Yes

Q64. If you have answered 'yes' please explain your reason and suggest how the negative impact could be removed or reduced for each proposed arrangement you have in mind.

All students, but particularly those who have suffered disproportionately, are in need of a tailored support package to ensure their transition to their chosen destination and the progress they make once there is successful and that learning loss can be addressed. There is nothing in the consultation that points to the provision of any extra support or assessment of how different groups have been affected and what solutions could help overcome the challenges faced. Institutions should conduct evaluations of outcomes in student recruitment and retention according to protected characteristics and vulnerable student communities and use the learning to develop wrap-around teaching and pastoral support for students.

There also needs to be greater use of contextual admissions by destination institutions to factor in the impact of the pandemic on the individual applicant's circumstances. The department could set clear guidelines for the use of contextual admissions for sixth forms, FE colleges and HEIs. The department should also work closely with the devolved administrations to ensure that all students in the home nations are treated equally, particularly given the cross-border mobility in FE and HE.

Students will need greater support with admissions, especially those who are already disadvantaged. Teachers and support staff have been doing their best to help students, but provision is uneven and dependent on capacity in individual institutions. The key thing this year is to enable student progression. No student should be left behind because of the impact on them of covid-19. UCU members care deeply about the students they teach and we want to ensure that they are given the opportunity to fulfil their ambitions and aspirations despite the terrible effects of this pandemic.

Q65. Are there additional burdens associated with the delivery of the proposed arrangements on which we are consulting that we have not identified above? If yes, what are they?

The proposals undoubtedly ask a lot of our teachers, work that would not in a usual year be required of them, and of course they have also been working in very challenging circumstances since the start of the pandemic. There simply isn't any slack in the system to allow them to take up extra duties without mitigations in place to reduce their workload in other areas. The department could issue guidance or set expectations about teachers not having to perform administrative or ancillary tasks not related to the core mission of securing students their grades. There needs to be recognition that teachers don't have infinite capacity, and that there has to be give elsewhere to enable them to perform these tasks.

Institutions will need financial assistance to provide the necessary support for students to help remedy the effects both of learning loss and the mental health impact of the pandemic. An investment in this will help save costs in the future from students falling out of education or not progressing as they should because of a lack of support. Work to help students catch up from last year's disruption has already taken place over the summer and in the first two terms of the year, and we now know that a significant amount of lost learning will also need to be caught up on next year. We shouldn't however be trying to fit the usual amount of teaching into the duration of courses, and we need to amend expectations accordingly. Extra teaching and support staff hours will need to be funded, and the possibility of fully funded foundation years for students and 'summer school' funding are also options that should be considered. It is clear that the disruptive effect of this pandemic will last for more than the immediate cohort of students and tailored support must be available to all.

## Your details

Which nation or country are you based in?

England

Q69. How did you find out about this consultation?

**Other (please specify):**  
Direct email

Is this the official response from your organisation or your own, personal response?

This is the official response from my organisation

## Your details (official response)

Q75. Which of these options best describes your organisation?

Other representative or interest group

## Your details (representative group)

Type of representative or interest group

Union

Confidentiality

Do you wish any part of your response to remain confidential?
No

Feedback

We want to write clearly and effectively, putting the reader first. How easy to read did you find this consultation? (Please rate from 1 very hard to read to 5 very easy to read)				
1	2	3	4	5
Very hard to read		X		Very easy to read