

By email to strategicrelationshipsqq@ofqual.gov.uk

Friday 29 January 2021

Consultation on the awarding of GCSE, AS and A Level qualifications in summer 2021

1. The Association of Directors of Children's Services Ltd. (ADCS) is the national leadership organisation in England for directors of children's services (DCSs) under the provisions of the *Children Act (2004)*. The DCS acts as a single point of leadership and accountability for services for children and young people in a local area, including children's social care and education. ADCS welcomes the opportunity to respond to the Department for Education's and Ofqual's joint consultation on the awarding of grades in summer 2021. While this consultation response predominantly focuses on the awarding of GCSEs, AS and A level grades, the points raised are also applicable to those young people undertaking VTQs and other general qualifications.
2. The impact of the pandemic and partial closure of schools has been considerable on all children and young people. It has resulted in potentially months of differential lost learning as well as having an impact on their social, emotional and mental wellbeing. Children and young people have sacrificed their learning for the wellbeing and safety of others. The loss of routine and formal learning in schools, colleges and other education settings will likely widen the attainment gap and it is therefore right that every effort should be made to support all pupils achieving their potential in their assessments during summer 2021.
3. The proposals in the consultation seem sensible and should avoid many of the problems experienced with exams and assessments in 2020. Not all pupils will have experienced lost learning to the same extent, whether this be due to poor access to digital equipment or because they have had to self-isolate and therefore spent more time out of the classroom. It is therefore right that measures are put in place to mitigate this through teacher assessment.
4. However, this clearly places an additional burden upon teaching staff who have experienced immense pressure over the past year. ADCS therefore agrees with the proposal for exam boards to provide support and information to schools and colleges to help them make their assessments. Guidance and training provided must be clear, timely and substantive to allow teachers to make an informed decision which is consistent with approaches taken in other schools and colleges. Clearly, teachers will have a limited ability to make a fully informed judgment of the attainment of some students due to the amount of time spent away from the classroom. This will impact on the amount of evidence that teachers can draw upon when making their final assessments and subsequently highlights the need for guidance to cover a wide range of options for teachers to consider when submitting evidence. The more time that teachers have to gather this evidence over the course of the remainder of the academic year, the easier it will be to make an accurate assessment.

5. With regard to the use of exam board assessments, consideration must be made to the varying degrees of lost learning across the country. Thus, if compulsory papers were to be set, they must be designed so that those who have lost the most learning are not disadvantaged by assessing what they have learnt and allow them to demonstrate this. Further, any assessment must allow for taking special considerations into account, however, this has largely been omitted from the consultation on GCSE, AS and A levels. While the consultation focuses on adjustments that can be made to account for the current circumstances, it should not be underestimated the disproportionate impact that the pandemic and national restrictions will have had on some pupils. ADCS is clear that any exceptional individual circumstances experienced by learners must be taken into account where appropriate, they should not be penalised for factors outside of their control.
6. It is important that schools are able to offer the necessary support for learners who may have suffered trauma and will likely have greater mental health and wellbeing needs. For some children, the absence of exam pressures, due to being away from school, has been a welcome break, however, an accountability system rooted in raw exam scores can serve to increase anxiety and stress. ADCS is clear that longer term there needs to be a more even balance between education and wellbeing where exam focussed assessments do not hinder the government's commitment to 'levelling-up' society.
7. The additional workload placed upon teachers must be considered carefully and this will also apply to the appeals process. Exams boards should work closely with schools to support them in this process and ensure that they are not placed under avoidable pressure and strain. While exam boards will want to ensure that schools and colleges are providing an accurate assessment, it should be recognised that teachers are best placed to understand the progress made and academic ability of their pupils. Teachers use their professional judgement on a regular basis and this should be taken into consideration as part of the quality assurance process.
8. ADCS [research](#) has shown that the number of children and young people becoming electively home educated (EHE) since September 2020 has increased dramatically. Where these children are assessed as private candidates it is not the responsibility of the school or local authority to ensure they receive a grade. However, a number of local authorities do provide support to EHE children through the use of FE colleges, or sometimes local schools, that may allow them to sit exams. Anecdotally, we are aware that during 2020 a number of EHE candidates struggled, or were unable, to receive a final grade as their previous school was not able to provide assessment information. Consequently, it may be that papers set by exams boards will provide the most appropriate route for the assessment of private candidates where teacher assessment is not possible. However, the sourcing of appropriate venues would need to be agreed as soon as possible, especially if there is an expectation that schools or colleges will facilitate this.

9. Providing clear, concise and timely guidance and communicating regularly with schools and colleges will be key to avoid as much stress and confusion as possible. Over the course of the pandemic and partial school closures, local authorities have worked closely with all schools and education settings in their local areas and have been a key source of support. The Department for Education and Ofqual should therefore keep local authorities informed of any updates and engage with them at every opportunity.

10. If there any questions or comments about this feedback, please contact matt.cunningham@adcs.org.uk in the first instance.