



Summary Paper: Education Policy Institute Proposals for Exams and Grading in 2021

January 2021



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We have responded to the government's consultation on examinations and grading in 2021, but as the consultation paper necessarily constrains the range of points which can be covered, we are also submitting this note to clearly set out our views on these issues and to highlight areas of key concern in relation to the proposed approach.

A.) The Cancellation of Exams in 2021

We believe that, on balance, the government was right to cancel public exams in 2021. Learning loss since the pandemic began appears to have been both significant and unequally spread. The latest lockdown means that schools and colleges could be closed for a large part of this and last year. Evidence indicates that this is particularly likely to have an adverse effect on disadvantaged students.

Exams could not, therefore, have been fair in 2021 - they would have been affected by whether students' personal, school or local circumstances were more or less affected by the pandemic. Results would not have commanded public confidence and would also have sent out inaccurate signals about the ability and potential of many students.

B.) Grading in 2021: The Alternative Approaches

Given that learning loss has been large and unequal, and that grading cannot now take place with public examinations, there is a serious issue about whether the usual grades can be safely awarded in 2021.

We note that following the move to Centre Assessed Grades in 2020, the Department for Education and Ofqual seem to have failed to put in place the sound "backstop" plan to grade students in 2021 without exams, which we argued for last year.

The absence of the usual public exams this year, combined with attempts in some way to mitigate for some learning loss, means quite simply that grading this year cannot in our view achieve the degree of consistency and accuracy that it does in a "normal" year (and even in "normal" years grades are not perfectly accurate).

It needs to be clearly understood, therefore, that grading this year will be less reliable than in previous years, both between students, between schools and colleges, and comparing the 2021 cohort with other recent and future cohorts.

For this reason, some people have made the case for abolishing GCSE, A Level and other qualification grading this year, or using a different grading system with fewer grade buckets. This is on the basis both of concerns about the likely quality and consistency of grading in 2021, and because of concerns about whether using the usual grading could also be misleading, as it might not imply the same level of knowledge and competence as in earlier years.



Advocates of this approach have argued that, instead, more focus should be put on ensuring that students progress as fairly and rationally as possible to their next education destination, with catch up support being made available for those students who need this.

The challenge of securing a set results in 2021 which are reasonably accurate and useful has caused us to give serious consideration to these other approaches.

We have on balance rejected these alternatives, for the reasons set out below. However, we would underline that we consider the approach being taken by the government as the "least bad option" rather than meeting the standards of reliability that we would usually expect from a qualification awarding system. We would also emphasise that if the government model is not delivered effectively, then it is still possible that it could be seen to have failed and not command public confidence when results are awarded this summer. The risks of a unsatisfactory outcome appear to be uncomfortably high.

Nevertheless, the reasons that we decided not to propose a different grading system (with fewer, broader, grade buckets), or no grading system at all, this year are:

- 1.) Such approaches might reduce the incentives for year 11 and 13 students to continue to study hard over the next 6 months.
- 2.) We consider that students, parents and employers expect grades to be awarded in the usual way, and are likely to be concerned if they are not. Students who have studied hard over many years see GCSE/A Level and other grades as important recognition of their efforts. We think there is very limited student and public support for alternative approaches.
- 3.) Having no grades or different grades could have a "scarring" effect on this cohort in the labour market, as they would likely be unique in not being awarded "normal" grades.
- 4.) A new and wider set of grade "buckets" would still mean there would be large (indeed, larger) incentives to err on the side of generosity at the grade borderlines and move students into the highest possible bucket. One set of distortions might be swapped for another.
- 5.) For university entry, while A Level grades will undoubtedly be less reliable than usual, we have no evidence as to whether universities selecting without grades would be more or less effective and fair. In any case, universities may now be likely to anticipate a more generous than normal grade distribution and may therefore make fewer conditional offers - essentially increasing the weighting that will be given this year by universities to other



information about students, rather than relying so heavily on A level grades to "sort" students.

We think one of the most powerful reasons being offered for scrapping the usual grading system is that grades this year may not signal the same degree of knowledge or competence as would be the case in previous years. This is particularly important where knowledge and skills are crucial for progression, for example:

- a.) Having adequate basic maths and English skills.
- b.) Having the maths and other skills needed to progress to higher study.
- e.) Having essential skills in vocational/technical subjects, where these are crucial for being able to practice.

But we believe (see below) that these concerns can be addressed in other ways.

C.) Risks involved in the government's proposed approach

Having decided, on balance, that the broad approach being taken by the government is the least bad option, we think it is essential to consider the significant risks that arise from this approach. In our view, the key risks are as follows:

1.) **Lack of clarity over how to set grades in 2021.** The consultation makes clear that teachers can make some allowance for course content not covered this year. Nevertheless, the consultation also states that teachers/centres must seek to award grades based on the "standard" that a child is performing at, and not their "potential" or likely standard, in the absence of the pandemic-related learning losses.

It is not wholly clear what this means, or that it will be interpreted in a consistent and fair way by teachers, either within centres or comparing centres.

When the government still planned to hold exams this year, the expectation created by the government and Ofqual was that the overall grade distribution in 2021 would look similar to that of 2020, even though the 2020 levels were very considerably higher than in 2019 and before. This implies that the government wanted to see overall grade levels "insulated" from pandemic related learning losses.

However, while the government and Ofqual seem willing to "wash out" learning loss at the national level, they are insistent that learning loss should not be compensated for at the school or student level, except to the extent that students can show that they have met the usual standard in a restricted part of the curriculum.

The cancellation of exams this year seems to have been driven by a view that the exams could not be fair because of differential learning loss, because this could not be reliably



allowed for through the exams system. But the government's stated approach seems to imply that they are willing for differential learning loss to impact on pupil level results.

Grading students on the standard reached this year would appear to suggest that the government might expect average grades to be lower (because of learning loss). Yet there simultaneously seems to be an expectation in that average grades awarded in 2021 may be even higher than in 2020. It seems difficult to reconcile these positions.

Because of this confusion, there is a real risk that teachers and schools will apply different judgements to setting grades this year. Some schools might reflect learning losses by awarding lower grades than in 2020. Others might award students a grade based on the standard achieved in a particular and narrow area of the curriculum. Others might require this standard to be achieved in a majority of the curriculum. Some schools might decide that learning losses have been so great that their students could not achieve their potential standard at all, but they might choose to compensate for this entirely based on the general expectation that this particular cohort should not be penalised for having been awarded grades at a time of the pandemic.

The scope for inconsistencies in approach from class to class and school to school seems to us to be very great. We believe some degree of inconsistency in grading is highly likely in 2021, and that this will be much greater than in a regular exam year.

While the government cannot completely eliminate this problem, the clearest possible guidance is needed if some consistency of results is to be achieved. The government and exam boards must be clear about how "achieving a standard" should be measured, and in our view they should allow a wide definition of acceptable evidence, to permit students who have been worst affected by the pandemic to be as reasonably judged as possible.

2.) **Avoiding Significant Further Grade Inflation.** The GCSE and A Level results in 2020 were very considerably higher, under the Centre Assessed Grades approach. In a "normal" year there can be large changes in many schools in their average points scored by qualification. However, in a normal year there is a relatively balanced distribution of schools getting better and worse results, and the order of magnitude of the rises and falls tends to be limited.

In 2020, very few schools saw significant overall declines in their average point scores, while a minority of schools experienced atypically large increases in their results. In addition, schools with lower average point scores typically experienced much bigger improvements in results - this seems likely to represent "more generous" grading than that through the exams system, rather than simply a "mean reversion" of schools with poor results.

Some school leaders whose overall results did not increase much last year may feel that their students ended up being disadvantaged compared to schools whose results saw very large rises.



This, combined with uncertainty over how to grade fairly under current circumstances, could lead to a very large degree of grade inflation in 2021 - some schools might, understandably, be tempted to grade more generously in 2021 to avoid their students "losing out". This is a concern because: significant grade inflation reduces the credibility of qualifications; significant grade inflation would be unfair to other cohorts of pupils; significant grade inflation would probably also be accompanied by large inconsistencies between students; and grade inflation could mask real learning losses and lead to students progressing on to destinations for which they are not properly prepared.

Excessive grading could also present a problem for universities and others, who are accustomed to using the grading system as a "sorting" mechanism.

3.) **Structure and use of the centrally-set assessments.** The government consultation proposes the use of assessments, prepared by the exam boards, to help inform centre assessment of grades.

There are complex issues around how such assessments should be structured, so as to be fair and meaningful for students who may not have covered the whole exam curriculum.

There are also serious risks to the credibility of the test if: test papers are taken at different times and are seen by some students well in advance of their test; test content varies very widely from school to school; tests are taken at home or not under normal exam conditions.

There is also a significant risk to the process of external moderation/checks if assessments are voluntary, and many schools decide not to use them.

4.) **Appeals.** A system without appeals would be unfair. But a system that makes it too easy to appeal could be swamped by mass appeals, which could be difficult to deal with fairly given the method of assessment/grading this year. There also needs to be an effective system to allocate grades if the exam boards or regulator considers that the grades of some schools are excessive (or for that matter too low, though this hardly seems the main risk). In our view, while schools may need to provide information to evidence that they followed the right process and took a valid judgement, the appeal should be made through the exam board itself, so there is proper oversight of the process and a buffer between schools and parents and carers.

5.) **Further Progression and Catch Up.** The risk that grading will be more generous this year than in 2019 or 2020, in spite of learning loss, raises the possibility of some students progressing to the next stage of their education without the skills they need to succeed in education or work. We need to identify significant learning loss and consider how this can be addressed. And we need to avoid some students proceeding to inappropriate destinations.



D.) Actions to mitigate risks

We would advise the following actions to mitigate the above risks:

1.) The DFE, exam boards and Ofqual should give **clear and consistent advice** to schools and colleges about how teachers can assess the standard to which a student is performing, in order to provide as accurate and consistent a grade as possible.

It is clear that the government is willing to allow students to be awarded grades where the standard reached across the whole syllabus is not equivalent to that in previous years (certainly before 2020). But clear guidance is needed on how to assess the standard achieved and whether this needs to be across some minimum part of the syllabus.

We are also concerned about a minority of students whose education may have been particularly badly impacted by the COVID-19 pandemic, and who are not at the end of their course working to their potential standard. These students may, however, have clearly been operating at a higher standard in the first 6-9 months of their course, before some of the pandemic effects took hold.

While we agree that it would not make sense to ask teachers to grade purely on "potential", we think that the government should in these circumstances allow students' work to be considered over the whole period of the qualification teaching, in order to be as fair as possible to students particularly adversely impacted by the pandemic.

We recognise that not everyone will share this view. However, we believe in practice that this is how many schools will choose to grade. We must ensure clarity about the grading rules, so there is as much consistency of treatment.

2.) The DFE, exam boards and Ofqual should make a clear statement on how they intend to apply "comparable outcomes" in 2021, and to what extent they plan to anchor the CAGs against the distribution of grades in 2020 and earlier years.

Our view is that there is a case for keeping the overall grade distribution in 2021 at a similar or slightly lower level than that of 2020, in order to treat those whose grades are affected by the COVID-19 pandemic in a similar way.

We believe that there is a much better chance of avoiding excessive grade inflation and inconsistency of approach if schools are given clear guidance about expectations of their grading distribution in 2021 versus earlier years.



It will also be much easier to quality check grading if exam boards can focus only on schools whose results seem to be obviously out of line, rather than having to check the grading of all schools and colleges - which we consider to be undeliverable to any reasonable standard.

One option would be to ask schools to submit results that are broadly similar to 2020, with the option that where schools do not believe this is fair to them, they can submit their own grading but with a higher level of scrutiny by the exam boards.

However, we are aware that there was a wider than normal range of increase in school and college grades in 2020, and many schools feel that they "lost out" to schools which graded more generously. Accepting the 2020 school results as a baseline, and allowing results only to differ modestly from this level before external scrutiny, would disadvantage schools and colleges who may feel they graded in a more reasonable and cautious way in 2020.

Our preference therefore is that grade expectations would be centred around the 2019 results, with a margin on either side of this to allow for the usual variation of results from year to year. Schools wanting to depart significantly from the 2019 results would need to be willing to subject themselves to detailed exam board scrutiny.

Our expectation is that this approach might lead to the overall grade distribution being somewhere between the 2019 and 2020 levels - we would regard this as an acceptable outcome.

3.) It follows from the above argument that given the difficulty in deriving grades in 2021, we think it is important that there should be external checks of the results by exam boards. This could include some random sampling, to ensure schools can evidence the grades they have set.

But we believe there is a strong case for a risk-based approach to checks and external moderation. Schools should, in our view, be told that checks will be light touch except for those schools which submit results which are materially higher (or lower) than the school results in 2019 (see above). Given the large rise in grades in 2020, and the learning loss that has taken place in most schools, we would not expect many schools to report results which are higher than 2020 results, this year.

Adequate time should be allowed to complete these external checks. The existing proposed timetable, for grades to be released in early July, looks unrealistic unless centres are required to submit grades earlier, which would then sacrifice learning time. It may therefore be that grades will need to be published sometime in late July or early August. We believe there could also be a case for publishing grades at the normal (mid-August) point, and we think it would be undesirable for school staff to have to deal extensively with appeal decisions in the middle of the school holidays, given the pressures on school leaders and teachers this year.



Students should be ranked by schools, in case the external checks require the schools to re-submit grades across the cohort.

4.) **Assessments.** To assist teachers in their grading judgements and to make moderation and external checking possible, we consider that short, standardised assessments should be compulsory in all schools. There should ideally be only one paper in each subject, and some subjects might not require an assessment (e.g. art, music, PE, design and technology).

The assessments should cover the full breadth of the curriculum so that pupils are able to be assessed only in the topics they have studied and, ideally, topics they have covered in school rather than remotely. Pupils should also be given advance notice of the topics they will be assessed on and the questions should be in a format with which pupils are familiar.

The assessments should be taken under exam conditions but in the classroom (to underline that this year they help inform the teacher judgement only). To avoid the papers being shared across schools/students before they are taken, these tests should all be taken on the same day at the same time. Alternatively, there must be a large number of possible papers, so that "cheating" is more made difficult. The papers should not be shared with teachers before the tests are taken. If schools are not back when the assessments would be taken (in late May), it might be necessary to drop them. It is unlikely that these assessments would be reliable if taken in the home environment - indeed, this could particularly affect more disadvantaged students, without strong home support and a conducive home environment.

We are aware of the arguments for making assessments optional or allowing schools to devise their own tests. We believe that though this has some attractions, it will ultimately drive higher school workload, would be confusing for students and (crucially) would undermine the external checking process.

5.) As part of the assessment and grading process, we believe schools and colleges should be encouraged to identify subjects where students need to have a body of core knowledge to safely progress further. **Where this knowledge is NOT in place, a catch-up strategy needs to be put in place, even where a student has been awarded a grade that would normally indicate mastery of that subject knowledge.**

This might include:

- a.) Students going to university/college who need to master a subject such as maths in order to cope with their course. Catch up can then be put in place by the university.
- b.) Vocational/technical subjects where core knowledge has not been mastered (eg safety knowledge).
- c.) GCSE students whose mastery of English and Maths isn't adequate for the likely demands of later life.



If the government is to permit grading this year which does not signify the usual level of skill and knowledge, it is essential that mitigations such as this are in place, with appropriate funding. This may require additional catch up funding to be allocated to school sixth forms, colleges and universities.

We would also recommend that students in Alternative Provision who have lost a large amount of learning should be funded to stay on for an additional year or two years, in order to ensure they are properly prepared for further study or work.

The government should also consider whether there could be a wider student entitlement to repeat their school/college year, for students who have lost a significant amount of learning and are dissatisfied with their results.

A key focus of the grading and assessment process this year must involve identifying future learning needs and ensuring students have the right support and guidance to progress on to the education and training routes which they aspire to and are able to cope with. We cannot deliver a perfect system of qualification grading in 2021, but it is essential that we do all we can to help this generation of students to realise their full potential and recover the opportunities which they might reasonably have expected, prior to the pandemic.

Acknowledgements: *EPI is grateful to The Centre for Education and Youth (CfEY) and the Harris Federation for convening groups of young people for discussions which were able to inform this position paper.*

