

**CONSULTATION
RESPONSE**

NASUWT
The Teachers' Union

Ofqual

**The General Qualifications Alternative Awarding
Framework**

**Technical consultation on Conditions and Requirements
for GCSE, GCE, AEA and Project qualifications in summer
2021**

11 March 2021

1. The NASUWT welcomes the opportunity to respond to Ofqual's consultation on the General Qualifications Alternative Awarding Framework; Technical consultation on Conditions and Requirements for GCSE, GCE, AEA and Project qualifications in summer 2021
2. The NASUWT is the teachers' union.

GENERAL COMMENTS

3. The NASUWT agrees that, given the extraordinary circumstances due to the pandemic, qualifications cannot be awarded through a public examination series. The Government's decision to entrust assessment to schools and

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colleges must be backed up by ensuring the necessary support and resources are available to enable centres to carry out this essential work.

4. The Union was disappointed that the Department for Education decided against the use of mandatory externally set and marked assessments which would have been invaluable as a source of consistent assessment evidence at an accepted standard on which to base the awarding of qualification grades. In the absence of the use of external marking for externally set assessments, it is imperative that the solution for qualifications in the summer of 2021 takes full account of the unprecedented pressures on teachers and school leaders; is deliverable in practice; avoids excessive and unnecessary workload burdens and ensures that fair, consistent and justifiable assessments are undertaken according to clear criteria and supported by sufficient training and guidance from the awarding bodies.
5. Government must make clear that centres should support the work of teachers and school and college leaders by allowing them to focus their attention on teaching and leading teaching and learning and using their professional judgement to support awarding.
6. Centres must ensure that they take all possible steps to create sufficient time to allow assessments to be carried out effectively and for staff to access relevant training, time and support.
7. It is critical to recognise that professional, candidate and public confidence in the awarding process this summer will necessitate assessment that is unambiguous and applied according to well understood, common criteria with arrangements that are robust and established in such a way that they deter groundless or speculative appeals and do not encourage second-guessing of centres' assessments.
8. It should also be made clear that candidate data are submitted to awarding bodies by centres on a corporate basis after due process of internal and external quality assurance and awarding body checks and is not the responsibility of any individual teacher or school leader.

9. The Department for Education and Ofqual must work with the NASUWT and other legitimate stakeholders to develop manageable contingency options if further disruption to centres creates problems in completing assessments effectively.
10. The NASUWT acknowledges that Ofqual's role is to regulate awarding bodies not centres and it is the decisions made by awarding bodies about arrangements that they impose on centres that will be the potential source of problems for teachers and school leaders, but the decisions are guided by the expectations laid out in Ofqual's guidance.
11. Ofqual also has a duty to support public confidence in the qualification system and to advise the Government in matters that could impact on this. Therefore the Union believes it is imperative that Ofqual gives due consideration to the points made below and how Ofqual's guidance can influence the awarding bodies' work.

SPECIFIC COMMENTS

Arrangements for assessment

12. The NASUWT accepts that there is a tension between flexibility that allows opportunity for candidates to be awarded a grade and the need for reliability and consistency of the awarding.
13. However flexibility, as set out in the consultation documents, gives rise to too much ambiguity which causes numerous problems around issues including:
 - consistency in and between centres;
 - meaningful guidance and quality assurance;
 - meaningful guidance on what will be expected in lieu of special considerations;
 - protecting teachers from pressure and demands from pupils and parents/carers;

- protecting teachers from workload pressures by clear and reasonable guidance on what counts as acceptable evidence and what explanations/rationale might be expected to be recorded and in what format; and
- protecting teachers from the appeals process.

The assessment process

14. It is essential that time be given in the working day to allow for training, evidence gathering and discussions in the internal quality assurance process. Awarding bodies should not expect teachers to undertake training outside of their working hours.

Awarding body guidance and quality assurance

15. Awarding body guidance and quality assurance will be key in clarifying what evidence will be required and how it should be presented and must take manageability and deliverability into account, bearing in mind that teachers' priority is to be the continued teaching of content, according to the DfE

16. It must make clear:

- what is meant by evidence of a candidate's progress over the course of study;
- how and for what purposes historic data should be used, ensuring that it is not workload or bureaucracy heavy;
- how teachers should make allowances for individuals' circumstances in lieu of the usual special considerations; and
- how teachers should weight evidence based on when and how the assessment is carried out.

17. It will also be key in ensuring that the processes are as consistent as possible across centres and awarding bodies and must be in line with other awarding bodies where the qualifications type is offered by more than one.

18. The guidance and quality assurance processes must be seen by the public, pupils and parents as a key part of the awarding process.
19. Every effort must be made to ensure that the processes can be done remotely to avoid any issues involving COVID security.
20. The processes must be devised in a way that anticipates the needs of any appeals process and that will negate the need for teachers to be available during their summer holiday.

Appeals

21. The awarding body guidelines and quality assurance must include arrangements that minimise the need for appeals, for example, clear proformas and requirements for how the centres should record the internal quality assurance process and a straightforward means of submitting data.
22. There should be no need to require teachers to be available in during the summer holiday to deal with appeals – the checking of data for errors is an administrative task and any evidence that has been used in awarding will have been collated for the internal QA process and, if necessary, for the external QA process which is finished before the end of term
23. There needs to be clear messages through DfE, Ofqual and awarding bodies about the awarding and appeals process that makes clear that these processes mean that, as directed by the Secretary of State, there are unlikely to be many circumstances where the final grade would be changed and that appellants also risk their grades being lowered.

Autumn exam series

24. The opportunity to sit exams in autumn should be encouraged as a better option to be awarded an improved grade than an appeal against a grade awarded in summer.
25. In order to avoid delaying progression, the autumn exam series needs to be held as early as possible in the autumn term with COVID-secure arrangements in place so the planning for such exams is not left to the last

minute and it should not be assumed that schools would be responsible for housing or delivering them.

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